



# FINAL MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY

FOR THE

## 2020 DEL NORTE REGIONAL TRANSPORTATION PLAN

FEBRUARY 18, 2021

*Prepared for:*

Del Norte Local Transportation Commission  
900 Northcrest Drive, PMD 16  
Crescent City, CA 95531

*Prepared by:*

De Novo Planning Group  
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D e N o v o P l a n n i n g G r o u p

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A Land Use Planning, Design, and Environmental Firm





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## **Proposed Mitigated Negative Declaration for the 2020 Del Norte Regional Transportation Plan**

**Lead Agency:** Del Norte Local Transportation Commission  
900 Northcrest Drive, PMB 16  
Crescent City, CA 95531

**Project Title:** 2020 Del Norte Regional Transportation Plan

**Project Location:** Del Norte County is in the northwestern corner of California, approximately 374 miles northwest of Sacramento and 330 miles southwest of Portland, Oregon. Del Norte County is bound by Siskiyou County in the east, Curry and Josephine Counties (Oregon) to the north, Humboldt County to the south, and the Pacific Ocean to the west.

Del Norte County is comprised of approximately 1,006 square miles, making it one of the smaller counties in California. Del Norte County is characterized by varied elevations that range between sea level to over 6,400 feet in the Klamath Mountain range and a varied geography that consists of extensive coastline to the west and mountainous terrain with dense redwood forests to the east. Del Norte County is known for its vast old-growth redwood forests, which attract visitors from all over the world.

Two major rivers occupy Del Norte County: the Smith River, which extends from the Six Rivers National Forest to the Pacific Ocean at the northwestern corner of the county, and the Klamath River, which extends from Klamath Lake in Oregon through the Six Rivers National Forest and to the Pacific Ocean at the southwestern corner of the county.

The county contains one incorporated city (Crescent City), six unincorporated communities (Smith River, Gasquet, Klamath, Fort Dick, Bertsch-Oceanview, and Hiouchi), and four federally recognized Tribal entities (Yurok Tribe, Resighini Rancheria, Tolowa Dee-ni' Nation and Elk Valley Rancheria). Del Norte County is susceptible to severe weather and natural disasters, including wildfire, tsunamis and flooding.

**Project Description:** The proposed project is the adoption and implementation of the 2020 Del Norte Regional Transportation Plan (RTP). The Del Norte Local Transportation Commission (DNLTC), as the designated Regional Transportation Planning Agency (RTPA), is required by State law to prepare the RTP and transmit it to the California Department of Transportation (Caltrans) every four years. The RTP is required to be developed as per State legislation, Government Code §65080 et seq. of Chapter 2.5.

The purpose of the Regional Transportation Plan (RTP) is to provide a vision for the region, supported by transportation goals, for ten-year (2030) and twenty-year (2040) planning horizons. The RTP documents the policy direction, actions, and funding strategies designed to maintain and improve the regional transportation system using the following methods:

- Assessing the current modes of transportation and the potential of new travel options within the region.
- Identifying projected growth corridors and predicting the future improvements and needs for travel and goods movement.
- Identifying and documenting specific actions necessary to address the region's mobility and accessibility needs, and establishing short and long-term goals to facilitate these actions.
- Identifying and integrating public policy decisions made by local, regional, State, and Federal officials regarding transportation expenditures and financing.

RTPs must include the following three elements:

- The Policy Element (Chapter 3) describes the transportation issues in the region, identifies and quantifies regional needs expressed within both a short- and long-range planning horizon, and maintains internal consistency with the financial element fund estimates. Related goals, objectives, and policies are provided along with performance indicators and measures.
- The Action Element (Chapter 4) identifies projects that address the needs and issues for each transportation mode in accordance with the policy element.
- The Financial Element (Chapter 5) summarizes the costs to operate and maintain the current transportation system, estimates the costs and revenues to implement the projects identified in the Action Plan, and outlines inventories of existing and potential transportation funding sources. Candidate projects are listed if funding becomes available and potential funding shortfalls are laid out. Lastly, alternative policy directions that affect the funding of projects are identified.

**Findings:**

In accordance with the California Environmental Quality Act, Del Norte Local Transportation Commission has prepared an Initial Study to determine whether the 2020 Del Norte Regional Transportation Plan (RTP) may have a significant adverse effect on the environment. The Initial Study and Proposed Mitigated Negative Declaration reflect the independent judgment of Del Norte Local Transportation Commission staff. On the basis of the Initial Study, Del Norte Local Transportation Commission hereby finds:

*Although the proposed project could have a significant adverse effect on the environment, there will not be a significant adverse effect in this case because the project has incorporated specific provisions to reduce impacts to a less than significant level and/or the mitigation measures described herein have been added to the project. A Mitigated Negative Declaration has thus been prepared. Additionally, every specific project identified in the RTP will be evaluated through the environmental process on a project level basis in accordance with the California Environmental Quality Act and the National Environmental Policy Act (when appropriate).*

The Initial Study, which provides the basis and reasons for this determination, is attached and/or referenced herein and is hereby made a part of this document. The goal of the RTP is to provide safe and efficient mobility to the citizens and visitors to Del Norte County with a multi-modal transportation network. The funding shortfall and availability of resources for transportation improvements within Del Norte County is considered the major constraint to implementing all the projects identified in the 2020 Del Norte Regional Transportation Plan. The RTP projects that are included, and that meet the “financial constraint” criteria, are considered priorities for the region to meeting RTP goals and policies established for the 2020 Del Norte RTP.

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Date

## **Proposed Mitigation Measures:**

The following Mitigation Measures are extracted from the Initial Study. These measures are designed to avoid or minimize potentially significant impacts, and thereby reduce them to an insignificant level. A Mitigation Monitoring and Reporting Program (MMRP) is an integral part of RTP project implementation to ensure that program level mitigation is properly implemented by the Del Norte Local Transportation Commission and the implementing agencies. The MMRP will describe actions required to implement the appropriate mitigation for each CEQA category including identifying the responsible agency, program timing, and program monitoring requirements. The applicability of each mitigation measure presented in the MMRP will be determined by the implementing agency at the time that an individual project is implemented. In some instances, a mitigation measure may not be applicable or relevant to a project. For instance, maintenance projects such as repaving, striping, signage, etc., are anticipated to be within the existing right-of-way and not cause a potentially significant impact that warrants mitigation. For individual projects that do not warrant these mitigation measures, the implementing agency will simply note in the project file that the mitigation measure is not applicable given its nature, and move forward with project implementation. On the other hand, some projects will encroach into areas that were not previously disturbed (i.e. road widening projects). It is anticipated that those projects have a greater potential for impact and will warrant compliance with these mitigation measures to ensure that impacts are reduced to an insignificant level, and in some cases, it may be determined that the individual projects cannot be designed such that there is an insignificant impact so either additional mitigation measures may be created to ensure an insignificant impact, or an EIR may be necessary for that project. The discretion on each project will be with the implementing agency based on the individual project circumstances. Based on this programmatic-level of analysis, and the conclusions provided in the Initial Study, the impacts from RTP implementation would be mitigated to less-than-significant levels with the implementation of the mitigation measures presented below, although it is anticipated that some larger projects (i.e. Caltrans 197/199 STAA, Last Chance Grade, etc.) would require a project specific level of analysis and will have project specific mitigation measures to ensure that impacts are avoided, minimized, and/or mitigated.

## **Biological Resources**

**Mitigation Measure 1:** *Prior to final design approval of RTP projects, take steps to identify and protect any biological resources associated with the project. The implementing agency should retain a qualified biologist to conduct a field reconnaissance of the limits of the project area to identify special status plants, animals, and their habitats, as well as protected natural communities including wetland and terrestrial communities. If the biologist identifies protected biological resources within the limits of the project area, consider alternative designs that seek to avoid and/or minimize impacts to the biological resources. If the project cannot be designed to completely avoid, coordinate with the appropriate regulatory agency (i.e. USFWS, NMFS, CDFW, ACOE) to obtain regulatory permits and implement project-specific mitigation prior to any construction activities.*

**Mitigation Measure 2:** *Prior to design approval of individual projects, the implementing agency will incorporate economically viable design measures, as applicable and necessary, to allow wildlife (terrestrial and/or aquatic) to move through the transportation corridor, both during construction activities and post construction. Potential measures should include appropriately spaced breaks in a center barrier, and other measures that are designed to allow wildlife to move through the transportation corridor.*

## **Cultural Resources**

**Mitigation Measure 3:** *During environmental review of individual projects, and prior to construction, if architectural resources are deemed as potentially eligible for the California Register of Historic Resources or the National Register of Historic Places as determined by a qualified architectural historian, the implementing agency should consider avoidance through project redesign as feasible. If avoidance is not feasible, the historic resource*

*should be formally documented through the use of large-format photography, measured drawings, written architectural descriptions, and historical narratives. The documentation should be entered into the Library of Congress, and archived in the California Historical Resources Information System. In the event of building relocation, ensure that any alterations to significant buildings or structures conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.*

**Mitigation Measure 4:** *If cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) are discovered work shall be halted immediately within 50 meters (165 feet) of the discovery, the implementing agency shall be notified, and a qualified archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to determine the significance of the discovery.*

*The implementing agency shall consider mitigation recommendations presented by the professional archaeologist for any unanticipated discoveries and shall carry out the measures deemed feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.*

## **Hydrology and Water Quality**

**Mitigation Measure 5:** *Comply with NPDES General Construction Permit requirements. To reduce or eliminate construction-related water quality effects, the implementing agency will ensure that transportation improvement projects comply with the requirements of the NPDES General Construction Permit. Project implementation agencies are required to obtain coverage under the General Construction Permit before the onset of any construction activities, where the disturbed area is 1 acre or greater in size.*

*A SWPPP will be developed by a qualified engineer or erosion control specialist in accordance with the NPDES General Construction Permit requirements. The SWPPP will be implemented prior to the issuance of any grading permit before construction. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB.*

*Compliance and coverage under the NPDES General Construction Permit will require controls of pollutant discharges that utilize BMPs and technology to reduce erosion and sediments to meet water quality standards. BMPs may consist of a wide variety of measures taken to reduce pollutants in stormwater runoff from the construction site. Temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover. will be employed to control erosion from disturbed areas.*

*Final selection of BMPs will be subject to approval by the implementing agency. The implementing agency will verify that an NOI has been filed with the SWRCB, and a SWPPP has been developed before allowing construction to begin.*

**Mitigation Measure 6:** *Implement a Spill Prevention and Control Program. As part of requiring compliance with the NPDES General Construction Permit, the implementing agency and its agents will develop and implement a spill prevention and control program to minimize the potential for, and effects from, spills of hazardous, toxic, or petroleum substances during all construction activities. The program will be completed before any construction activities begin.*

**Mitigation Measure 7:** *Implement measures to maintain water quality after construction. The project implementing agencies will implement source and treatment control measures according to the County Stormwater Quality Program. General site design control measures are required to minimize the volume and rate*



of stormwater runoff discharge from the project site. General site design control measures incorporated into the project design can include:

- conserving natural areas;
- protecting slopes and channels;
- minimizing impervious areas;
- storm drain identification, and appropriate messaging and signing; and
- minimizing effective imperviousness through the use of turf buffers and/or grass-lined channels, if feasible.

In addition, projects must include treatment control measures, if possible and when feasible, to remove pollutants from stormwater runoff prior to discharge to the storm drain system or receiving water. Treatment control measures may include, but not be limited to, the following:

- Vegetated buffer strip
- Vegetated swale
- Extended detention basin
- Wet pond
- Constructed wetland
- Detention basin/sand filter
- Porous pavement detention
- Porous landscape detention
- Infiltration basin
- Infiltration trench
- Media filter
- Retention/irrigation
- Proprietary control device

Selection and implementation of these measures would be based on a project-by-project basis depending on project size and stormwater treatment needs.

**Mitigation Measure 8:** Comply with provisions for dewatering. Before discharging any dewatered effluent to surface water, the project implementation agency will obtain an NPDES permit and Waste Discharge Requirement from the RWQCB and/or the North Coast RWQCB, as appropriate. Depending on the volume and characteristics of the discharge, coverage under the NPDES General Construction Permit may be permissible. If coverage under the General Construction Permit is not allowed, the project will conform to requirements of the General Dewatering Permit, issued by the RWQCB and/or other applicable agencies. The project implementation agencies will design and implement measures as necessary so that the discharge limits identified in the relevant permit are met.

**Mitigation Measure 9:** Conduct project-level drainage studies. As part of the infrastructure plan, the project implementation agencies and/or their contractors will conduct a drainage study. This study will address the following topics:

- A calculation of pre-development runoff conditions and post-development runoff scenarios using appropriate engineering methods. This analysis will evaluate potential changes to runoff through specific design criteria, and account for increased surface runoff.
- An assessment of existing drainage facilities within the project area, and an inventory of necessary upgrades, replacements, redesigns, and/or rehabilitation, including the sizing of on-site stormwater detention features and pump stations.
- A description of the proposed maintenance program for the onsite drainage system.
- Standards for drainage systems to be installed on a project/parcel-specific basis.
- Proposed design measures to ensure structures are not located within 100-year floodplain areas.

*Drainage systems will be designed in accordance with the county's, Flood Control Agency's, and other applicable flood control design criteria. As a performance standard, measures to be implemented from those studies will provide for no net increase in peak stormwater discharge relative to current conditions, ensure that 100-year flooding and its potential impacts are maintained at or below current levels, and that people and structures are not exposed to additional flood risk.*

**Mitigation Measure 10:** *Avoid restriction of flood flows. Proposed projects requiring federal approval or funding will comply with Executive Order 11988 for floodplain management. Projects will avoid incompatible floodplain development designs, they will restore and preserve the natural and beneficial floodplain values, and they will maintain consistency with the standards and criteria of the National Flood Insurance Program. In addition, a Letter of Map Revision (LOMR) will be prepared and submitted to FEMA where unavoidable construction would occur within 100-year floodplains. The LOMR will include revised local base flood elevations for projects constructed within flood prone areas. Potential impacts due to flooding as a result of RTP projects are assumed to be alleviated through the FEMA LOMR approval process.*

**Mitigation Measure 11:** *Avoid project dewatering. Project designs that require continual de-watering activities for the life of the projects will be avoided if possible. Due to the potential for flooding and destabilizing conditions, project implementation agencies will choose project designs that do not require continual dewatering, if suitable project alternatives exist. Project alternatives may include construction of overpasses, as opposed to below-grade underpasses, which would avoid interception with groundwater.*

**Mitigation Measure 12:** *Design projects to ensure that no tsunami evacuation routes are obstructed, including during any construction process. An obstruction would occur if foot and/or vehicle traffic were impeded from traveling to a refuge site.*

## Noise

**Mitigation Measure 13:** *Prior to approval of new construction projects adjacent to noise-sensitive uses, the implementing agency shall perform a project-level noise evaluation. The implementing agencies shall consider the following measures:*

- *Construct vegetative earth berms with mature trees and landscaping to attenuate roadway noise on adjacent residences or other sensitive use, and /or sound walls or other similar sound-attenuating buffers, as appropriate.*
- *Design projects to maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, transit centers, park-and-ride lots, and other new noise generating facilities.*
- *Establish speed limits ~~and limits on hours of operation~~ of transit systems.*

**Mitigation Measure 14:** *Subsequent projects under the RTP shall be designed and implemented to reduce adverse construction noise and vibration impacts to sensitive receptors, as feasible. Measures to reduce noise and vibration effects may include, but are not limited to:*

- *Limit noise-generating construction activities, excluding those that would result in a safety concern to workers or the public, to the least noise-sensitive daytime hours, which is generally 6am to 9pm.*
- *Construction of temporary sound barriers to shield noise-sensitive land uses.*
- *Location of noise-generating stationary equipment (e.g., power generators, compressors, etc.) at the furthest practical distance from nearby noise-sensitive land uses.*

- *Phase demolition, earth-moving and ground-impacting operations so as not to occur in the same time period.*
- *Use of equipment noise-reduction devices (e.g., mufflers, intake silencers, and engine shrouds) in accordance with manufacturers' recommendations.*
- *Substituting noise/vibration-generating equipment with equipment or procedures that would generate lower levels of noise/vibration. For instance, in comparison to impact piles, drilled piles or the use of a sonic or vibratory pile driver are preferred alternatives where geological conditions would permit their use.*
- *Other specific measures as they are deemed appropriate by the implementing agency to maintain consistency with adopted policies and regulations regarding noise.*
- *Comply with all local noise control and noise rules, regulations, and ordinances.*

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## INITIAL STUDY CHECKLIST

### **PROJECT TITLE**

2020 Del Norte Regional Transportation Plan

### **LEAD AGENCY NAME AND ADDRESS**

Del Norte Local Transportation Commission  
900 Northcrest Drive, PMB 16  
Crescent City, CA 95531

### **CONTACT PERSON AND PHONE NUMBER**

Tamera Leighton, Executive Director  
Del Norte Local Transportation Commission  
900 Northcrest Drive, PMB 16  
Crescent City, California 95531  
tamera@dnltc.org  
Desk: 707 465 3878

### **PROJECT SPONSOR'S NAME AND ADDRESS**

Del Norte Local Transportation Commission  
900 Northcrest Drive, PMB 16  
Crescent City, CA 95531

### **DEL NORTE LOCAL TRANSPORTATION COMMISSION**

The Del Norte Local Transportation Commission (DNLTC) is the designated Regional Transportation Planning Agency (RTPA) for Del Norte County. The DNLTC is comprised of six commissioners, three each appointed by the Crescent City Council and the Del Norte County Board of Supervisors. Del Norte County is located within the jurisdictional boundaries of Caltrans District 1, located in Eureka. The DNLTC, along with Caltrans District 1, fulfills the transportation planning responsibilities for Del Norte County. One of the main responsibilities of the DNLTC is the preparation and approval of the Regional Transportation Plan.

### **PROJECT LOCATION AND SETTING**

Del Norte County is in the northwestern corner of California, approximately 374 miles northwest of Sacramento and 330 miles southwest of Portland, Oregon (Figure 1). Del Norte County is bound by Siskiyou County in the east, Curry and Josephine Counties (Oregon) to the north, Humboldt County to the south, and the Pacific Ocean to the west.

Del Norte County is comprised of approximately 1,006 square miles, making it one of the smaller counties in California. Del Norte County is characterized by varied elevations that range between sea level to over 6,400 feet in the Klamath Mountain range and a varied geography that consists of extensive coastline to the west and mountainous terrain with dense redwood forests to the east. Del Norte County is known for its vast old-growth redwood forests, which attract visitors from all over the world.

Two major rivers occupy Del Norte County: the Smith River, which extends from the Six Rivers National Forest to the Pacific Ocean at the northwestern corner of the County, and the Klamath

River, which extends from Klamath Lake in Oregon through the Six Rivers National Forest and to the Pacific Ocean at the southwestern corner of the county.

The county contains one incorporated city (Crescent City), six unincorporated communities (Smith River, Gasquet, Klamath, Fort Dick, Bertsch-Oceanview, and Hiouchi), and four federally recognized Tribal entities (Yurok Tribe, Resighini Rancheria, Tolowa Dee-ni' Nation and Elk Valley Rancheria). Del Norte County is susceptible to severe weather and natural disasters, including wildfire, tsunamis and flooding.

**Population:** Del Norte County's population was 25,885 in 2015 and increased to 25,967 by 2019 at a minor increase of 0.32% in recent years. Unincorporated Del Norte County experienced a minor decrease in population, dropping from 21,870 to 21,737 from 2015 to 2019, and Crescent City experienced a small increase in population from 4,015 in 2015 to 4,230 in 2019.

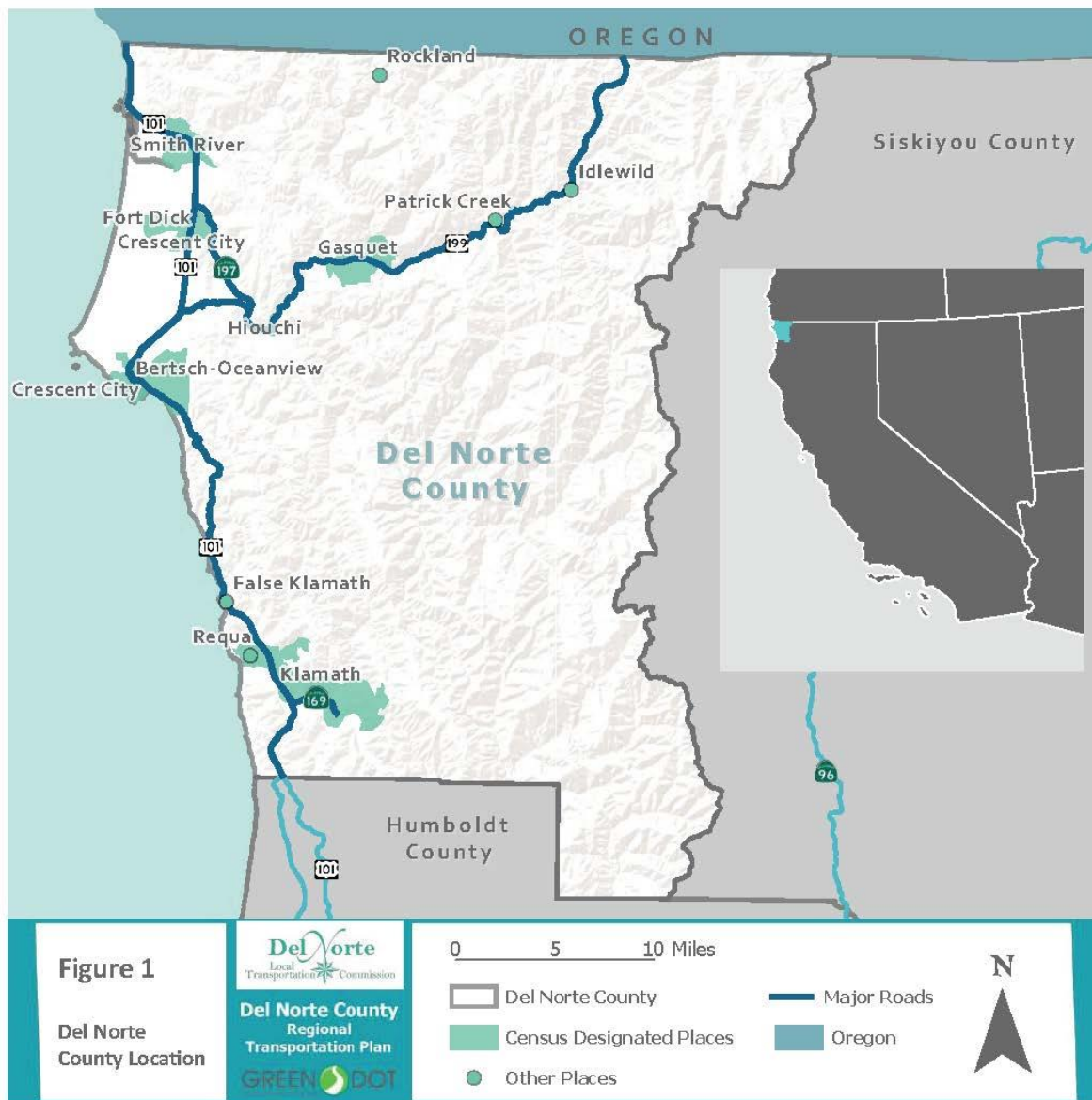
The population of Del Norte County is projected to decrease by 4.0% between 2020 and 2040, which translates to an average annual decrease of 0.2%. Over the 20-year lifetime of the Regional Transportation Plan, the population of 24,528 is expected to decrease to 23,542 by 2040.

## PROJECT DESCRIPTION

The proposed project is the adoption and implementation of the 2020 Del Norte County Regional Transportation Plan (RTP). The Del Norte Local Transportation Commission (DNLTC), as the designated Regional Transportation Planning Agency (RTPA), is required by State law to prepare the RTP and transmit it to the California Department of Transportation (Caltrans) every four years. The RTP is required to be developed as per State legislation, Government Code §65080 et seq. of Chapter 2.5.

The 2020 Regional Transportation Plan is considered a "project" under CEQA, and although this Initial Study provides baseline mitigation measures for certain elements of the RTP, this Initial Study is largely focused on the RTP as a long-term planning document (20 years). Projects identified within the RTP will be individually evaluated under CEQA at the project level when the project is being delivered, and therefore will include more detailed mitigation measures at that time. The purpose of the Regional Transportation Plan (RTP) is to provide a vision for the region, supported by transportation goals, for ten-year (2030) and twenty-year (2040) planning horizons. The RTP documents the policy direction, actions, and funding strategies designed to maintain and improve the regional transportation system using the following methods:

- Assessing the current modes of transportation and the potential of new travel options within the region.
- Identifying projected growth corridors and predicting the future improvements and needs for travel and goods movement.
- Identifying and documenting specific actions necessary to address the region's mobility and accessibility needs, and establishing short and long-term goals to facilitate these actions.
- Identifying and integrating public policy decisions made by local, regional, State, and Federal officials regarding transportation expenditures and financing.





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RTPs must include the following three elements:

- The Policy Element (Chapter 3) describes the transportation issues in the region, identifies and quantifies regional needs expressed within both a short- and long-range planning horizon, and maintains internal consistency with the financial element fund estimates. Related goals, objectives, and policies are provided along with performance indicators and measures.
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## **GENERAL PLAN AND ZONING**

The RTP goals objectives, and policies were developed to be consistent with the General Plans for Del Norte County and the City of Crescent City. The RTP is not a land use planning document, and does not establish, or cause changes to land uses or zoning within these jurisdictions. All land use and zoning decisions within the RTP's planning area fall under the jurisdiction of Del Norte County or the City of Crescent City. The RTP is designed as a system of transportation improvements that support circulation and land use policy decisions that have been made by these jurisdictions, and which are reflected in their respective General Plans and Zoning ordinances.

## **NEW PLANNING REQUIREMENTS**

Since the adoption of the most recent Del Norte County RTP in 2016, there has been an update to the RTP Guidelines. The 2017 RTP Guidelines, adopted January 18, 2017, incorporated several key changes to the RTP process to address changes in the planning process resulting from MAP-21/FAST Act, Moving Ahead for Progress in the 21st Century, Senate Bill 32 (SB 32), Assembly Bill 1482 (AB 1482), Senate Bill 246 (SB 246), Senate Bill 350 (SB 350), and Executive Orders B-16-12 and B-32-15.

SB 32, signed into law on September 8, 2016, extends Assembly Bill 32's (AB 32) required reductions of GHG emissions by requiring a GHG reduction of at least 40 percent of 1990 levels no later than December 31, 2030. Furthermore, SB 32 authorizes the California Air and Resources Board (ARB) to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

AB 1482 and SB 246 implement new climate change adaptation methods such as increasing the availability of affordable housing and improving infrastructure to be climate resilient while encouraging local and regional coordination in such efforts. SB 350 outlines strategies for MPOs and RTPAs to implement widespread transportation electrification to meet climate goals and federal air quality standards. Executive Orders B-16-12 and B-32-15 set additional GHG reduction targets and methods of implementation.

## RTP PLANNING PROCESS

**Inter-Agency Coordination:** The DNLTC is served by the Technical Advisory Committee (TAC) which provides technical advice to the Del Norte Local Transportation Commission. The eight members of the TAC are appointed by the DNLTC and include representatives from the following entities:

- Two from the City of Crescent City
- Two from the County of Del Norte
- California Highway Patrol
- Caltrans
- Redwood Coast Transit Authority
- Yurok Tribe

Additionally, the DNLTC is served by the Social Services Transportation Advisory Council (SSTAC) whose members are appointed by the DNLTC and represent seniors, people with disabilities, and people of limited means regarding transit matters.

**Participation and Coordination:** The DNLTC coordinated with many other groups during the RTP development process. The DNLTC plans for the regional transportation system in coordination with regional stakeholders. During the development of the RTP the following entities were contacted for information and solicited for input:

- Area One Agency on Aging
- County and District School Superintendent
- Crescent City Harbor
- Crescent City/Del Norte County Chamber of Commerce
- Del Norte Healthcare District
- Del Norte Solid Waste Management Authority
- Redwood Coast Transit
- Sutter Coast Hospital
- Adjacent county RTPAs (Curry, Jackson, Siskiyou, Humboldt)
- Tribal Entities (Yurok Tribe, Resighini Rancheria, Elk Valley Rancheria, Tolowa Dee-ni' Nation)
- California Highway Patrol
- Caltrans District 1
- Border Coast Regional Airport Authority
- Redwood State and Federal Parks

For a comprehensive list of stakeholders contacted, see Attachment A of the RTP.

**Public Participation:** Although the Del Norte region was impacted by both the global COVID pandemic and seasonal wildfires during the development of the 2020 RTP update, a creative and inclusive public participation campaign was executed to inform the public about the RTP and include the public in the planning process. The community was notified about the RTP and invited to community workshops through a project website, a social media campaign including Facebook and Twitter, and newspaper ads. To accommodate social distancing recommendations, community meetings were held on the digital platform Zoom. In addition, community members were notified of the option to provide feedback online through various channels, including the project website, the DNLTC website, via a questionnaire promoted through various social media channels, and directly to the project team via email or phone.

The introductory workshop, held on October 20th, 2020, introduced the Regional Transportation Plan and presented draft elements including the policies, action, and financial elements for feedback and review. Community members who attended were given the opportunity to provide input on prioritized projects, recommend new transportation projects, identify transportation issues, and voice their concerns. The meeting included a presentation on the benefits of regional transportation planning, existing conditions and barriers to mobility, and solutions for improving transportation throughout the county. After the presentation, the project team was available to interact with community members and provide more in depth discussion on transportation issues in the region. The questionnaire as promoted during meetings.

For a full list of outreach methods and materials, see Attachment B of the RTP.

**Coordination with Other Plans and Studies:** During development of the 2020 RTP update, existing plans, policy documents and studies addressing transportation in Del Norte County were reviewed. These documents are listed below:

#### Del Norte Regional Transportation Plan 2020

- Del Norte General Plan Circulation Element (2003)
- Crescent City General Plan (2001)
- Del Norte County Short-Range Transit Plan (2014)
- Redwood Coast Transit Authority Short Range Transit Plan (2019)
- Coordinated Public Transit – Human Service Transportation Plan (2015)
- Final Public Participation Plan (2013)
- Wild Rivers Regional Blueprint Plan (2009)
- Annual Unmet Transit Needs
- Active Transportation Plan (2017)
- Ten-Year State Highway Operation and Protection Plan (2008/09 through 2017/18)
- STIP Fund Estimate, Caltrans (2020)
- California Transportation Plan 2040
- California Strategic Highway Safety Plan (SHSP) (2020)
- Climate Adaptation and Stormwater Management Plan (2015)
- Transportation Emergency Preparedness Initiative (2013)
- Del Norte Region SB 743 Implementation Plan (2020)

**Transportation/Land Use Integration:** This RTP is consistent with the county’s General Plan Circulation Element, which supports the development and maintenance of an efficient, safe, and effective road system. The Circulation Element also supports an integrated multi-modal system consistent with demand and available resources, as well as the study of orderly growth of both the Del Norte County Airport and the Crescent City Harbor. The goals of the General Plan circulation element are consistent with the goals outlined in the Policy Element.

This RTP recognizes the importance of integrating land use planning and transportation planning to create a more efficient system. Future development should occur in areas which will be the easiest to develop without high public service costs, have the least negative environmental impact, and which will not displace or endanger the region’s critical natural resources. This approach will result in lower cost for improvements and increased operational efficiency of the existing transportation system because it will be sized to reflect more compact growth near existing or planned services. Compact growth leads to healthier lifestyles, as access

to bicycle and pedestrian facilities grow congruently. Additionally, aligning bicycle and pedestrian facilities with growth can help implement complete streets which increase livability and reduce traffic demand within the region by encouraging alternative modes. The complete street concept is supported and encouraged in this RTP and the California Transportation Plan 2040.

**Coordination with the California State Wildlife Action Plan:** Projects identified in the 2020 Regional Transportation Plan are evaluated at the project level through the CEQA and NEPA (if applicable) process. However, the long-term goals identified in the Policy Element of this plan consider many of the stressors defined in the State Wildlife Action Plan.

Del Norte County straddles two separate conservation management ecoregions within the North Coast and Klamath Province, as identified by the California State Wildlife Action Plan (SWAP): “Northern Coastal and Montane Riparian Forests and Woodlands” and “Pacific Northwest Conifer Forests”. The SWAP identifies sensitive species, habitat stressors and suggested conservation goals and actions for each of the ecoregions within the Provinces. According to the SWAP, the major stressors within Del Norte County conservation units are as follows:

- Agricultural and Forestry Effluents
- Annual and Perennial Non-timber Crops
- Climate Change
- Fire and Fire Suppression
- Household Sewage/ Urban Wastewater
- Introduced Genetic Material
- Parasites/Pathogens/Diseases
- Roads and Railroads
- Wood and Pulp Plantations
- Logging and Wood Harvesting
- Livestock, Farming and Ranching
- Invasive Plants/Species

For a complete list of species of special concern, key stressors and actions suggested for wildlife management in the North Coast and Klamath region, see Attachment C of the RTP.

**Coordination with Native American Tribal Governments:** There are four federally recognized Tribal entities in Del Norte County. Cooperative planning between Tribes, regional and local agencies and Caltrans varies from Tribe to Tribe. Some of the region’s Tribes are regular participants in regional planning efforts, including the Yurok Tribe who has a regular position on the Technical Advisory Committee. All Tribal entities were contacted to discuss transportation deficiencies, system improvements ideas, and Tribal project lists for inclusion. Table 1.1 lists the contact information for the Tribes. For a full record of Native American Tribal coordination and consultation efforts, see Attachment D of the RTP.

**Table PD-1: Native American Tribal Contacts**

TRIBAL ENTITY	CONTACT	ADDRESS
Yurok Tribe	Joseph James, Chairman jjames@yuroktribe.nsn.us	190 Klamath Blvd. Klamath, CA 95548
Elk Valley Rancheria	Dale Miller, Chairman dmiller@elk-valley.com	2332 Howland Hill Rd. Crescent City, CA 95531
Tolowa Dee-ni' Nation	Denise Richards-Padgette, Chairperson	140 Rowdy Creek Rd.

	dpadgette@towola.com	Smith River, CA 95567
Resighini Rancheria	Fawn Murphy, Chairperson resighini@gmail.com	158 East Klamath Bech Rd. Klamath, CA 95548

SOURCES: DEL NORTE LOCAL TRANSPORTATION COMMISSION (2020)

## PROJECT LIST

As a method of developing responses to the transportation needs and issues discussed in the RTP document, the RTP includes a list of transportation system improvements for each mode of transportation applicable to Del Norte County. Projects for each type of transportation facility are divided into financially constrained (short range) and financially unconstrained (long range) improvements. The project lists are provided below.

**Table PD-2 Roadway Projects**

PROJECT SOURCE	FUNDING SOURCE	ROAD	DESCRIPTION	COST	YEAR
<b>Short Range Projects</b>					
<b>Del Norte County</b>					
2016 RTP	FLAP, TC	Klamath Beach Road	Klamath Beach Road Improvement Project (Highway 101 to Coastal Drive) - culvert replacement	\$ 4,776,000	2025
2020 RTP	HIP, RSTP	Washington Boulevard	Washington Boulevard Culvert Replacement Project (East of Harrold Street) - culvert replacement	\$ 500,000	2023
2020 RTP	ER, RSTP	Pebble Beach Drive	Pebble Beach Drive Storm Damage Project (Hemlock Avenue to City Limits) - bluff stabilization	\$ 10,019,430	2022
<b>Del Norte County Total</b>				<b>\$ 15,295,430</b>	
<b>Crescent City</b>					
2020 RTP	FHWA ER/RSTP	Pebble Beach Dr.	Storm Drain Damage Project-Bank Stabilization Project	\$ 5,000,000	2030
<b>Crescent City Total</b>				<b>\$ 5,000,000</b>	
<b>Short Range Total</b>				<b>\$ 20,295,430</b>	
<b>Long Range Projects</b>					
<b>Del Norte County</b>					
2016 RTP	TBD	Requa Road	(Highway 101 to P. J. Murphy Memorial Drive) - overlay with drainage improvements	\$ 648,000	TBD
2016 RTP	TBD	P. J. Murphy Memorial Drive	(Requa Road to End) - overlay with drainage improvements	\$ 1,194,000	TBD
2020 RTP	TBD	Pebble Beach Drive	(Hemlock Avenue to Washington Boulevard) - overlay	\$ 825,000	TBD
2020 RTP	TBD	Fred Haight Drive	(at Morrison Creek) - culvert replacement	\$ 475,000	TBD
2016 RTP	RMRA	NA	(Area 1 - Klamath) - chip seal and overlay	\$ 280,000	TBD
2016 RTP	RMRA	NA	(Area 2 - Bertsch Tract) - chip seal and overlay	\$ 189,750	TBD
2016 RTP	RMRA	NA	(Area 3 - Elk Valley and Parkway) - chip seal and overlay	\$ 375,000	TBD
2016 RTP	RMRA	NA	(Area 4 - Filkins Tract) - chip seal and overlay	\$ 360,000	TBD
2016 RTP	RMRA	NA	(Area 5 - West of Northcrest) - chip seal and overlay	\$ 140,000	TBD
2016 RTP	RMRA	NA	(Area 6 - East of Northcrest) - chip seal and overlay	\$ 80,000	TBD
2016 RTP	RMRA	NA	(Area 7 - Mid Lake Earl & Kings Valley) - chip seal and overlay	\$ 160,000	TBD
2016 RTP	RMRA	NA	(Area 8 - Fort Dick) - chip seal and overlay	\$ 465,000	TBD
2016 RTP	RMRA	NA	(Area 9 - Smith River) - chip seal and overlay	\$ 315,000	TBD
2016 RTP	RMRA	NA	(Area 10 - Hiouchi and Gasquet) - chip seal and overlay	\$ 630,000	TBD
2016 RTP	CDBG	NA	(Roosevelt Tract) - complete streets (with regional drainage improvements)	\$ 10,585,000	TBD
2017 ATP	ATP	Elk Valley	(Sunset High School) - turn pockets	\$ 87,000	TBD

		Cross Road			
2019 Regional SSAR	TBD	TBD	pavement delineation and guardrail installation	\$ 8,725,000	TBD
2019 Regional SSAR	TBD	TBD	signal hardware upgrade and installation of pedestrian countdown signal heads	\$ 270,000	TBD
2019 Regional SSAR	HSIP	Parkway Drive and Washington Boulevard	roundabout	\$ -	TBD
2019 Regional SSAR	HSIP	Washington Boulevard and Northcrest Drive	Improve signal hardware: lenses, back-plates, mounting, size, and number, Improve signal timing (coordination, phases, red, yellow, or operation), Provide Advanced Dilemma Zone Detection for high speed approaches, Convert signal to mast arm (from pedestal-mounted), Install raised pavement markers and striping (Through Intersection), Install flashing beacons as advance warning (S.I.), Improve pavement friction (High Friction Surface Treatments)	\$ -	TBD
<b>Del Norte County Total</b>				<b>\$ 25,803,750</b>	
<b>Crescent City</b>					
2016 RTP	TBD	A Street	7th St, Pacific Ave Reconstruction	\$ 2,000,000	TBD
2016 RTP	TBD	Front Street	A St. to L St., Revitalization (including subcomponents)	\$ 6,900,000	TBD
2016 RTP	TBD	Front Street	a. Water Infrastructure Improvements G Street to L Street	\$ 200,000	TBD
2016 RTP	TBD	Front Street	B. Storm Drain Improvements G Street to L Street	\$ 900,000	TBD
2016 RTP	TBD	Front Street	c. Pedestrian Improvements D Street to G Street (South Side) & G Street to L Street	\$ 2,000,000	TBD
2016 RTP	TBD	Front Street	d. Transit Improvements (5310)	\$ 600,000	TBD
2016 RTP	TBD	Front Street	e. B Street Roundabout Improvements	\$ 2,000,000	TBD
2016 RTP	TBD	Front Street	f. Roadway Reconstruction D Street to G Street Parking & G Street to L Street	\$ 1,200,000	TBD
2016 RTP	SB1/TBD	K Street	Front St. to 3rd St. Reconstruction	\$ 600,000	TBD
2016 RTP	TBD	NA	Various Roadway Microsurfacing	\$ 1,000,000	TBD
2016 RTP	TBD	Sunset Circle	101 to Elk Valley, Reconstruction	\$ 1,250,000	TBD
2020 RTP	TBD	3rd Street	Pebble Beach to L St. Resurfacing	\$ 2,800,000	TBD
2020 RTP	TBD	5th Street	Pebble Beach to L St. Resurfacing	\$ 2,800,000	TBD
2016 RTP	TBD	7th Street	Pebble Beach to L St. Reconstruction	\$ 5,000,000	TBD
2016 RTP	TBD	8th Street	Pebble Beach to L St. Reconstruction	\$ 5,000,000	TBD
2016 RTP	TBD	Howe Drive	Stamps Way to B St., Rehabilitation & Parking Area	\$ 1,000,000	TBD
2016 RTP	TBD	Wendell Street	4th St. to 9th St., Rehabilitation	\$ 1,000,000	TBD
2016 RTP	TBD	C Street	5th St. to 9th St., Rehabilitation	\$ 800,000	TBD
2016 RTP	TBD	D Street	2nd St. to 9th St., Rehabilitation	\$ 1,400,000	TBD
2020 RTP	TBD	Taylor	Between 6th and 7th Resurfacing	\$ 200,000	TBD
2020 RTP	TBD	Harding	Hwy 101 to Truman ct., Rehabilitation	\$ 600,000	TBD
2020 RTP	TBD	Northcrest Drive	Rehabilitation	\$ 550,000	TBD
2020 RTP	TBD	Pebble Beach Dr.	5th to City/County Limits Rehabilitation	\$ 1,400,000	TBD
2016 RTP	TBD	NA	Roosevelt Tract Annexation Area- Reconstruct existing streets (14 Blocks)	\$ 5,000,000	TBD
2016 RTP	TBD	NA	Other Annexation Areas- To be programmed	\$ -	TBD
2019 Regional SSAR	TBD	TBD	Sign and Pavement Delineation Upgrade	\$ 680,000	TBD
2019 Regional SSAR	TBD	TBD	Signal Hardware Upgrade and Installation of Pedestrian Countdown Signal Heads	\$ 234,000	TBD
2019 Regional SSAR	HSIP	Northcrest Dr and Harding Ave	Improve signal timing (coordination, phases, red, yellow, or operation), Install raised pavement markers and striping (Through Intersection), Improve pavement friction (High Friction Surface Treatments), Convert intersection to roundabout (from signal)	\$ -	TBD

<b>Crescent City Total</b>				<b>\$ 47,114,000</b>	
<b>Long Range Total</b>				<b>\$ 72,917,750</b>	
<b>Caltrans</b>					
2016 RTP	SHOPP	US 199	.4 mi. N of South Fork Road to .56 mi. S of Idlewild Maint. Station Rd.-High friction surface treatment	\$ 2,130	TBD
Caltrans 0115000099	SHOPP	US 101	Last Chance Grade - repair slides, construct bypass from Wilson Creek Bridge to 3.8 miles North of Wilson Creek Bridge	\$ 339,233	2039
Caltrans 0116000137	SHOPP	US 101	Near Crescent City, at 0.2 mile north of Cushing Creek Viaduct. Restore roadway to pre-slide condition.	\$ 9,985,000	2024
Caltrans 0119000028	SHOPP	SR 199	Culvert rehabilitation and fish passage near Crescent City, at various locations from 0.3 miles north of Elk Valley Cross Road to 0.2 miles south of Walker Road.	\$ 3,574,000	2022
Caltrans, 0116000005	SHOPP	US 199	Near the Oregon State line, from 0.1 mile to 0.5 mile north of Collier Safety Roadside Rest Area (SRRA). Upgrade lighting and power control system at the Randolph Collier Tunnel.	\$ 4,880,000	2023
Caltrans 0115000094	SHOPP	US 101	In Klamath, from 0.2 mile south to 0.2 mile north of Ehlers Way. Extend the left-turn pocket at the intersection of Ehlers Way and Route 101.	\$ 1,585,000	2022
Caltrans 0116000060	SHOPP	US 199	Near Gasquet, at the Idlewild Maintenance Station. Construct new office space building and rehabilitate water and septic system.	\$ 5,511,000	2023
Caltrans 0112000287	SHOPP	SR 199	Collier Rest Area Rehab near Idlewild from Collier Rest Area entrance to north end of Collier Tunnel	\$ 2,721,000	2020
Caltrans 0120000070	SHOPP	US 101	Construct ADA Path in Crescent City from 0.4 miles south of Washington Street Bridge to 0.2 mile West.	\$ 1,250,000	2024
Caltrans 0120000101	Maintenance	US 101	Micro-surfacing near Smith River from 0.2 mile North of Rowdy Creek Bridge to Oregon State line.	\$ 606,000	2021
Caltrans 0119000047	Maintenance	SR 199	Middle Fork Smith River Overlay near Patrick Creek from Patrick Creek Bridge to Oregon State Line	\$ 3,800,000	2021
Caltrans 0117000070	Maintenance	DN-Various	Replace Pavement Markers in Del Norte County at various locations	\$ 200,000	2022
Caltrans 0118000190	SHOPP	US 101	CAPM Pavement Rehabilitation in and near Klamath River	\$ 30,864,000	2026
Caltrans 0113000023	SHOPP	US 101	In and near Crescent City, from 0.3 mile south of Elk Valley Road to 0.2 mile north of Wilson Ave/Burtschell Street. Upgrade Americans with Disabilities Act (ADA) facilities and construct traffic calming measures to improve operations and safety for non-motorized users.	\$ 8,017,000	2022
Caltrans 0119000016	SHOPP	SR 199	In Del Norte County, at various locations from 0.6 mile north of Hiouchi Drive to 0.1 mile south of the Oregon State line. Culvert rehabilitation and fish passage	\$ 1,590,000	2022
Caltrans 0116000128	SHOPP	SR 199	Near Gasquet, from 0.8 to 0.3 mile south of Hardscrabble Creek Bridge. Install High Friction Surface Treatment (HFST), signs, guardrail and centerline rumble strip.	\$ 1,502,000	2021
Caltrans 0116000005	SHOPP	SR 199	Near the Oregon State line , from 0.1 mile to 0.5 mile north of Collier Safety Roadside Rest Area (SRRA). Upgrade lighting and power control system at the Randolph Collier Tunnel No. 01-0049	\$ 4,880,000	2023
Caltrans 0120000033	SHOPP	US 101	Wilson Creek Restoration & SPGA Wall near Klamath from Wilson Creek Bridge to 0.5 miles north	\$ 18,339,000	2028
<b>Caltrans Total</b>				<b>\$ 99,645,363</b>	



**Table PD-3 Bridge Replacement or Rehabilitation Projects**

PROJECT SOURCE	FUNDING SOURCE	ROAD	DESCRIPTION	COST	YEAR
<b>Short Range Projects</b>					
<i>Del Norte County</i>					
2020 RTP	HBP, TC	Requa Road	Requa Road at Hunter Creek Bridge Replacement Project	\$ 12,120,000	2023
<b>Del Norte County Total</b>				<b>\$ 12,120,000</b>	
<i>Caltrans</i>					
Caltrans 0100020444	SHOPP	US 101	Near Klamath, at Panther Creek Bridge No. 01-0025 and Hunter Creek Bridge No. 01-0020 - Replace Bridges	\$ 23,397,000	2023
2020 SHOPP 0120000028	SHOPP	US 101	Near Klamath, at Panther Creek Bridge No. 01-0025 and at Hunter Creek Bridge No. 01-0003. Environmental mitigation monitoring for project EA 0B090.	\$ 438,000	2021-22
2020 SHOPP 0100000193	SHOPP	US 101	Near Crescent City from 0.3 mile south to 0.4 mile north of Smith River (Dr. Ernest M Fine Memorial) Bridge No. 01-0020. Replace bridge	\$ 79,035,000	2025
Caltrans 0115000108	SHOPP	US 101	Fish passage mitigation near Smith River at Dominie Creek	\$ 5,293,000	2023
Caltrans 0118000186	SB1 RMRA	Various	Bridge repair at various locations in Del Norte County	\$ 1,022,000	2021
Caltrans 0100020444	SHOPP	US 101	Near Klamath, bridge replacement at Panther Creek and Hunter Creek	\$ 23,397,000	2023
Caltrans 0119000116	Maintenance	DN-Various	Rehab Bridge Decks at various locations in Del Norte County	\$ 1,500,000	2023
<b>Caltrans Total</b>				<b>\$134,082,000</b>	
<b>Short Range Total</b>				<b>\$146,202,000</b>	

**Table PD-4 Bicycle and Pedestrian Projects**

PROJECT SOURCE	ROAD	DESCRIPTION	COST	YEAR
<i>Del Norte County</i>				
2016 RTP	Glenn Street	(Small Avenue to Hamilton Avenue) - complete street (add sidewalk)	\$ 936,000	TBD
2016 RTP	Harrold Street	(Washington Boulevard to Wilson Avenue) - complete street (add sidewalk)	\$ 2,106,000	TBD
2016 RTP	Third Street	(Fred Haight Drive to Beckstead Road) - complete street (add sidewalk)	\$ 1,092,000	TBD
2016 RTP	Sarina Road	(Highway 101 to First Street) - Class II bikeway	\$ 850,000	TBD
2016 RTP	Fred Haight Drive	(Highway 101 on south end to First Street) - Class II bikeway	\$ 5,380,000	TBD
2016 RTP	Morehead Road	(Lake Earl Drive to Lower Lake Road) - Class II bikeway	\$ 3,052,000	TBD
2017 ATP	Elk Valley Road	(Howland Hill to Parkway Drive) - Class II bikeway	\$ 5,694,000	TBD
2016 RTP	Elk Valley Cross Road	(Wonder Stump Road to Parkway Drive) - Class II bikeway	\$ 2,014,000	TBD
2016 RTP	Blackwell Lane	(Lake Earl Drive to Railroad Avenue) - Class II bikeway	\$ 1,070,000	TBD
2016 RTP	Ocean View Drive	(Highway 101 on north end to Indian Road) - Class II bikeway	\$ 4,373,000	TBD
2016 RTP	Ocean View Drive	(Highway 101 on south end to Indian Road) - Class II bikeway	\$ 4,908,000	TBD
2016 RTP	Alder Road	(Blackwell Lane to Lake Earl Drive) - Class II bikeway	\$ 1,007,000	TBD
2016 RTP	Kings Valley Road	(Wonder Stump Road Extension to Rellim Road) - Class II bikeway	\$ 1,856,000	TBD
2016 RTP	Old Mill Road	(Northcrest Drive to Dillman Road) - Class II bikeway	\$ 1,101,000	TBD
2016 RTP	Endert's Beach Road	(Highway 101 to End (National Park Service, 0.8 miles)) - Class II bikeway	\$ 1,353,000	TBD
2016 RTP	South Fork Road	(Highway 199 to Big Flat Road) - Class III bikeway	\$ 45,000	TBD
2017 ATP	Lower Lake Road	(Lake Earl Drive to Pala Road) - Class III bikeway	\$ 17,000	TBD
2016 RTP	Kellogg Road	(Lower Lake Road to End (Kellogg Beach)) - Class III bikeway	\$ 5,000	TBD
2016 RTP	Old Mill Road	(Dillman Road to Lake Earl Wildlife Area) - Class II bikeway	\$ 1,479,000	TBD
2017 ATP	Northcrest Drive	(east side from Washington Boulevard to Harding Avenue) - complete	\$ 1,560,000	TBD

		street (add sidewalk)		
2017 ATP	NA	(Clifford Kamph Memorial Park in Smith River) - Maintain and improve beach access, trail system, and support facilities, including parking and restrooms, for active transportation users.	\$ -	TBD
2017 ATP	NA	(Florence Keller County Park in Crescent City) - Maintain and improve trail system and support facilities, including parking and restrooms, for active transportation users.	\$ -	TBD
2017 ATP	Pebble Beach Drive	(Bluffs, North and South Stairs in Crescent City from Point Saint George to City Limits) - Maintain and improve beach access, trail system (formal and informal), and support facilities, including parking and restrooms, for active transportation users.	\$ -	TBD
2017 ATP	NA	(Point Saint George in Crescent City) - Develop trail system and support facilities, including parking, restrooms, and visitors center, for active transportation users.	\$ -	TBD
2017 ATP	NA	(Ruby Van Deventer County Park in Hiouchi) - Maintain and improve trail system and support facilities, including parking and restrooms, for active transportation users.	\$ -	TBD
	NA	(CA DFW Saxton Boat Launch in Smith River) - Maintain and improve support facilities, including parking and restrooms, for active transportation users.	\$ -	TBD
2017 ATP	Wavecrest Drive	(Wavecrest Drive and North Pebble Beach Drive Coastal Access Plan Project) - Maintain and improve beach access and support facilities, including parking, for active transportation users. [FUNDING FOR ENVIRONMENTAL, PERMITTING, AND 30% PLANS ARE CONSTRAINED WITH \$51,750 ALLOCATED.]	\$ 500,000	TBD
2017 ATP	Pebble Beach Dr	(Wavecrest Drive and North Pebble Beach Drive Coastal Access Plan Project) - Maintain and improve beach access and support facilities, including parking, for active transportation users. [FUNDING FOR ENVIRONMENTAL, PERMITTING, AND 30% PLANS ARE CONSTRAINED WITH \$51,750 ALLOCATED.]	\$ 500,000	TBD
2017 ATP	Arlington Drive	(Adams Avenue to Washington Boulevard) - complete street (add sidewalk)	\$ 507,000	TBD
2017 ATP	First Street	(Sarina Road to Fred Haight Drive) - Class II bikeway	\$ 1,668,000	TBD
	Northcrest Drive	(east side from West Madison Avenue to Pine Grove Road) - complete street (add sidewalk)	\$ 1,170,000	TBD
2020 RTP	Pacific Avenue	(north side from Del Norte Street to Calaveras Street) - complete street (add sidewalk)	\$ 98,000	TBD
2020 RTP	Pacific Avenue	(south side from Pebble Beach Drive to Del Monte Street) - complete street (add sidewalk)	\$ 702,000	TBD
2020 RTP	Washington Blvd	(south side from Jordan Street to Leif Circle) - complete street (add sidewalk)	\$ 507,000	TBD
2020 RTP	Washington Blvd	(south side from Summer Lane to Washington Boulevard overpass) - complete street (add sidewalk)	\$ 390,000	TBD
2019 SSAR	Summer Lane	(Washington Boulevard to Scenic Creek Drive) - Class II bikeway	\$ 8,000	TBD
<b>Del Norte County Total</b>			<b>\$ 45,948,000</b>	
<b>Crescent City</b>				
2019 SSAR	Northcrest Drive and Harding Avenue	Install pedestrian countdown signal heads, Install pedestrian crossing (S.I.), Install advance stop bar before crosswalk (Bicycle Box)	\$ -	TBD
2016 RTP	Pebble Beach Dr.	6th St. to 9th St. Pedestrian Improvements	\$ 1,000,000	TBD
2016 RTP	NA	Bicycle Racks- 8 locations	\$ 8,000	TBD
2016 RTP	8th Street / K St.	Class 2 Bike Lane	\$ 100,000	TBD
2016 RTP	NA	City Wide Priority Pedestrian Improvements	\$ 1,500,000	TBD
2017 ATP	Hobbs Wall Trail	M St to DFG	\$ 2,000,000	TBD
2017 ATP	Highway 101	Traffic calming - Highway 101 on North and South entrances to Crescent City	\$ 1,200,000	TBD
2017 ATP	Front Street	A Street to B Street, G Street to N Street	\$ 2,000,000	TBD
2017 ATP	Highway 101	Non motorized improvements between the Gateway Projects	\$ -	TBD
2017 ATP	10th and E Streets	Install curb ramps	\$ -	TBD
2017 ATP	C & D Street between 2nd to 4th Uncharted Shores Academy	Install curb ramps at crosswalks adjacent to school grounds	\$ -	TBD

2017 ATP	9th, Front, K, 2nd St	City Streets	\$ 100,000	TBD
2020 RTP	Howe Drive	Coastal Trail Resurfacing	\$ -	TBD
<b>Crescent City Total</b>			<b>\$ 7,908,000</b>	
<b>Bicycle and Pedestrian Project Total</b>			<b>\$53,856,000</b>	

**Table PD-5 Transit Projects**

PROJECT SOURCE	FUNDING SOURCE	DESCRIPTION	COST	YEAR
<b>Short Range Projects</b>				
2019 RCTA SRTP	FTA, PTMISEA, LTF	Vehicle Replacements/Rehabilitations (6)	\$ 991,722	2021/22 - 2023/24
	LCTOP, LTF, TBD	Electric Bus Charging Infrastructure (4)	\$ 308,173	2022/23 - 2023-24
	FTA, SGR, LTF	Vehicle Replacements/Rehabilitations (2)(3)	\$ 8,595,014	2024/25 - 2040/41
2019 RCTA SRTP	STA-SGR	Bus Stop Improvements/Amenities	\$ 122,439	2021/22 - 2023/24
<b>Short Range Total</b>			<b>\$10,017,348</b>	
<b>Long Range Projects</b>				
2019 RCTA SRTP	PTMISEA, LTF	Facility Improvements (1)	\$ 163,079	TBD
	TBD	RCTA Operations & Maintenance Facility Refurbishment/Renovation (5)	\$ 1,000,000	TBD
<b>Long Range Total</b>			<b>\$1,163,079</b>	

- (1) current amount of remnant PTMISEA programmed to Facility Projects, accrues interest, last of PTMISEA funds
- (2) RCTA must replace 2 buses per year to maintain fleet size/condition, assumes 1 larger diesel and 1 smaller electric bus per year (450,000/yr)
- (3) PTMISEA was one-time funding that will be fully spent by 2024, LTF and SGR will replace PTMISEA for local match thereafter
- (4) RCTA is mandated to introduce zero-emission buses by CARB regulation - project in planning phase now, costs ballpark
- (5) RCTA Operations & Maintenance Facility will need a major renovation late in the planning horizon - ground lease expires 2044
- (6) FTA for capital at RCTA includes 5339, as no 5311(f) is available for capital statewide (effective 2017) and all 5311 goes to operating

**Table PD-6 Aviation Projects**

PROJECT SOURCE	DESCRIPTION	COST	YEAR
<b>Short Range Projects</b>			
<b>Ward Airport</b>			
2016 RTP	Perimeter Fencing	\$ 250,000	2021
2016 RTP	Obstruction Clearance	\$ 175,000	2016-2030
2016 RTP	Slurry Seal Runway & Apron	\$ 175,000	2022
2017 ALUCP	Add perimeter fencing	\$ -	2021
2017 ALUCP	Clear obstructions	\$ -	2016-2030
	Annual Maintenance (Short Term)	\$ 100,000	2020-2030
<b>Ward Airport Total</b>		<b>\$ 700,000</b>	
<b>McBeth Airport</b>			
2016 RTP	Obstruction Clearance	\$ 75,000	2016-2030
	Annual Maintenance (Short Term)	\$ 100,000	2020-2030
<b>McBeth Airport Total</b>		<b>\$ 175,000</b>	
<b>McNamara Airport</b>			
2016 RTP	Extension of Rwy 11/29	\$ 15,000,000	2022
2016 RTP	Acquire new larger Airport Rescue Fire Fighting (ARFF) vehicle (to meet requirements for larger aircraft)	\$ 750,000	2022
	Annual Maintenance (Short Term)	\$ 100,000	2020-2030
<b>McNamara Airport Total</b>		<b>\$ 15,850,000</b>	
<b>Short Range Total</b>		<b>\$ 16,725,000</b>	
<b>Long Range Projects</b>			
<b>Ward Airport</b>			
	Annual Maintenance (Long Term)	\$ 100,000	2030-2040
<b>Ward Airport Total</b>		<b>\$ 100,000</b>	
<b>McBeth Airport</b>			

	Annual Maintenance (Long Term)	\$ 100,000	2030-2040
<b>McBeth Airport Total</b>		<b>\$ 100,000</b>	
<b>McNamara Airport</b>			
2016 RTP	Construct Terminal Parking Lot	\$ 6,069,000	TBD
2016 RTP	Complete Final Design of Terminal Replacement	\$ 1,900,000	TBD
2016 RTP	Reimbursable Agreements	\$ 1,000,000	TBD
2016 RTP	Construct New Terminal Apron	\$ 2,673,000	TBD
2016 RTP	Construct New Terminal Building (17,867 sq. ft.)	\$ 16,391,000	TBD
2016 RTP	Design Runway Overlay Project	\$ 250,000	TBD
2016 RTP	Overlay Runways 1237 & 1836	\$ 8,822,000	TBD
2016 RTP	Acquire Property for Extension of Rwy 11/29	\$ 1,400,000	TBD
2016 RTP	Design of Extension of Rwy 11/29 & Road Realignments	\$ 600,000	TBD
2016 RTP	Realignment of Washington Blvd and Riverside Street	\$ 1,000,000	TBD
	Annual Maintenance (Long Term)	\$ 100,000	2030-2040
<b>McNamara Airport Total</b>		<b>\$ 40,205,000</b>	
<b>Ground Access Projects</b>			
2016 RTP	Design and construct RSA grading and filling projects	\$ 1,305,000	TBD
<b>Ground Access Total</b>		<b>\$ 1,305,000</b>	
<b>Long Range Total</b>		<b>\$ 41,710,000</b>	

**Table PD-7 Tribal Projects**

<i>PROJECT SOURCE</i>	<i>ROAD/LOCATION</i>	<i>PROJECT NAME/LOCATION</i>	<i>COST</i>	<i>YEAR</i>
<b>Elk Valley Rancheria</b>				
2016 RTP	Martin Ranch Road	Construct Elk Ranch Road on the Martin Ranch	-	TBD
2016 RTP	Dale Rupert Road	Construction - Improvements to Dale Rupert Road	-	TBD
2016 RTP	US 101	At Sandmine Road - Construction - Improve left turn channelization for Southbound traffic on US 101	-	TBD
2016 RTP	US 101	At Humboldt Road - Construction - Add declaration lane to US 101 for Northbound traffic turning right onto Humboldt Road	-	TBD
2016 RTP	US 101	At Humboldt Road and Sandmine Road - construction - Add southbound acceleration lane from Humboldt and Sandmine Roads onto US 101	-	TBD
2016 RTP	Matthews Street, Norris Avenue and Howland Hill Rd	Facilities - Curbs, gutters, sidewalks and lights	-	TBD
2016 RTP	US 199	Construction - Construct alternate route to Last Chance Grade	-	TBD
<b>Tolowa Dee-ni' Nation (Smith River Rancheria)</b>				
2016 RTP	Lucky 7 Casino Access Road	Relocate Lucky 7 Casino Access Road - Roadway Realignment	-	TBD
2016 RTP	North Indian Road	Construct Sidewalks	-	TBD
2016 RTP	Oceanview Drive	Roadway Rehabilitation- overlay	-	TBD
2016 RTP	Oceanview Drive	Widen shoulder or construct separate pedestrian path along downhill side of road	-	TBD
2016 RTP	South Indian Road	Planting strip and unpaved pedestrian path along west side of road	-	TBD
2016 RTP	1st Street	Construct sidewalks from North Beckstead to Sarina Rd	-	TBD
2016 RTP	US 101	North Indian Road to Mouth of Smith River Rd and US 101 South Gateway - South of Westbrook Lane to South of Rowdy Creek - Various gateway treatment and traffic calming measures	\$2,750,000	TBD
2016 RTP	US 101	Lake Earl Drive to Oregon Border - Various traffic calming improvements- turn pockets, raised delineators, warning signs, wrap fog lines around curb returns, skip lines	\$2,750,000	TBD
2016 RTP	North and South Indian Rd	N/S Indian Road & Mouth of Smith River Road	-	TBD
<b>Yurok Tribe</b>				
<b>Roadways and Bridges</b>				
2016 LRTP	SR 169	Reconstruction of 20.1 miles of State Route 169 from Wautec to Weitchpec with design speeds as specified by Caltrans.	-	TBD
2016 LRTP	SR 169	Implementation of safety improvements along 20.1 miles of State Route 169 from Wautec to Weitchpec as specified by Caltrans.	-	TBD

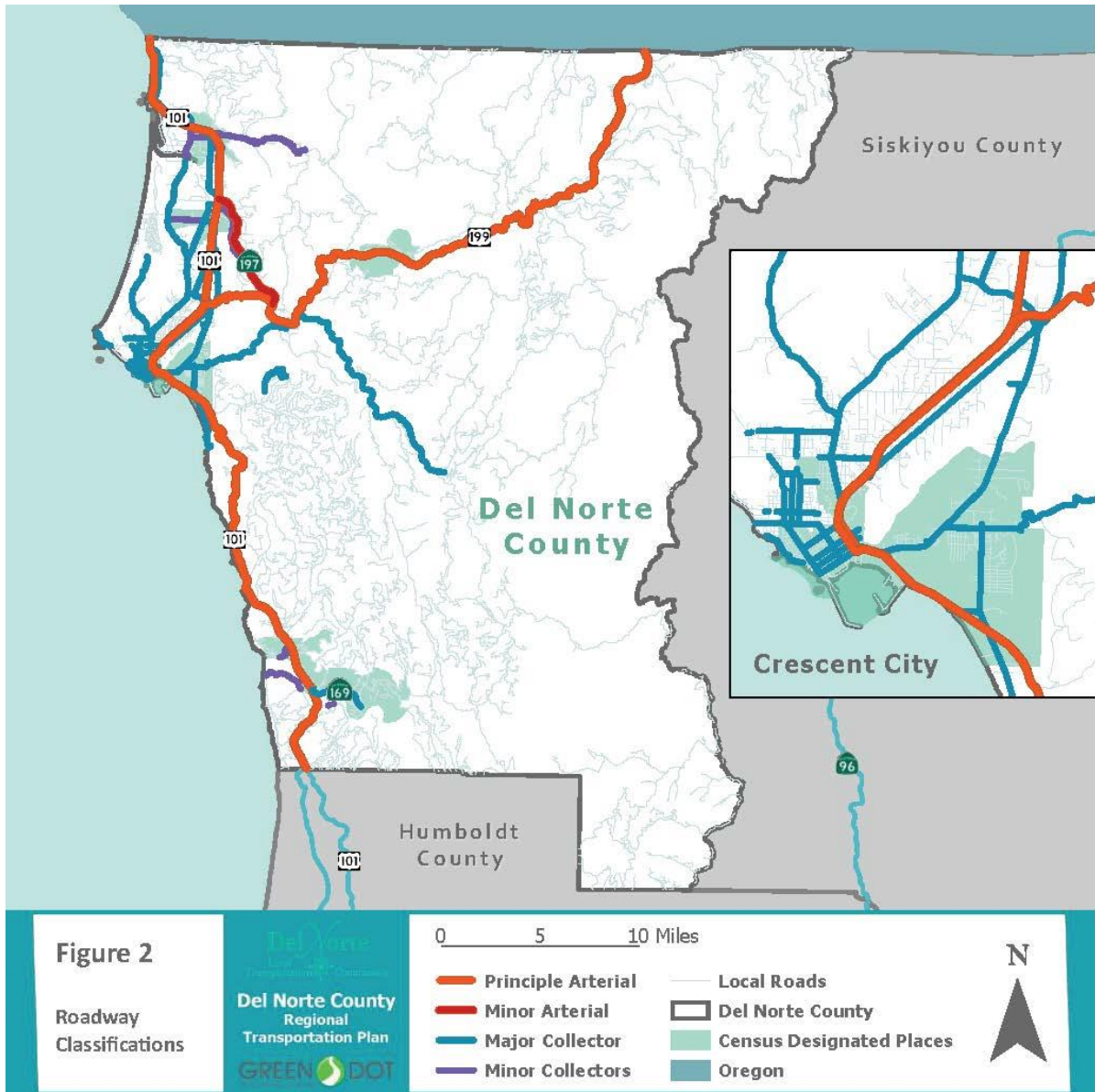
2016 L RTP	SR 169	Extension of Route 169 connecting Wautec to HWY 101 requiring the construction of a bridge over the Klamath River near Wautec and a 13- mile connection route to HWY 101 with a design speed of 30-mph as specified by Caltrans.	-	TBD
2016 L RTP	Morek Wan Road	Reconstruction, widening, and paving of 0.35 miles of Morek Wan Road and 0.8 miles of McKinnon Hill Road.	-	TBD
2016 L RTP	Lake Prairie Road	Reconstruction, widening, and paving of 3.35 miles of Lake Prairie Road.	-	TBD
2016 L RTP	Weitchpec New Village Road	Reconstruction, widening, and paving of 0.2 miles of Weitchpec New Village Road.	-	TBD
2016 L RTP	Tulley Creek Road	Resurfacing BIA Section of Tulley Creek Road (BIA Route 3) (2.3 miles) with Chip Seal or reconstruction, widening, and paving Tulley Creek Road.	-	TBD
2016 L RTP	Ke'pel Road	Drafting of an investigation/feasibility study for potential new crossing location above existing crossing at Ke'pel Road gap over Coon Creek.	-	TBD
2016 L RTP	Wausek Road	Improvement of 0.30 miles of Wausek Road (BIA 4240).	-	TBD
2016 L RTP	Blake Road	Upgrade of 0.30 miles of Blake Road.	-	TBD
2016 L RTP	Requa Road	Raising of the Requa Road Prism between Hunter Creek and Salt Creek and the replacement of both creek crossing structures.	-	TBD
2016 L RTP	Various	Pavement overlays and re-striping of all existing paved roads (State, County, and BIA) that have not been previously listed.	-	TBD
2016 L RTP	NA	Development of a Project Study Report for the creation of a Yurok Road Maintenance Division.	-	TBD
<b>River Transit</b>				
2016 L RTP	NA	Acquire two ferries	-	TBD
2016 L RTP	Blue Creek	Dock at Blue Creek	-	TBD
2016 L RTP	Various	Maintenance of six up-river gravel launch sites	-	TBD
2016 L RTP	Various	Secured parking facilities and a coordinated interconnection with a Yurok bus and transit system	-	TBD
2016 L RTP	Transportation Facilities Building	Transportation Facilities Building (Shared project with Public Transportation)	-	TBD
2016 L RTP	NA	Redwood Canoe Adventure Program	-	TBD
<b>Public Transportation</b>				
2016 L RTP	Various	Implementation of a Public Bus System - Secure parking facilities	-	TBD
2016 L RTP	Transportation Facilities Building	Transportation Facilities Building (Shared project with River Transit)	-	TBD
<b>Bicycle and Pedestrian/Trails</b>				
2016 L RTP	HWY 101, HWY 169	The creation of Pedestrian Paths along HWY 101 and 169 in Del Norte including signage, widening of shoulders, and other actions necessary to accommodate pedestrian traffic	-	TBD
2016 L RTP	Various	Overall improvements of bicycle/pedestrian accessibility throughout the Reservation	-	TBD
2016 L RTP	Coyote Creek	Coyote Creek Bike Trail	-	TBD
2016 L RTP	NA	B-Line Bike Trail	-	TBD
2016 L RTP	Klamath Beach Road	Klamath Beach Road Bike Trail	-	TBD
2016 L RTP	Klamath	Create a 1 mile exercise trail with fitness stations in Klamath including a route kiosk, route striping/signage, and parcourse-style fitness equipment.	-	TBD
2016 L RTP	Various	Create a fitness trail network in proximity to upriver populated villages. These networks could combine trail segments that also function for transportation.	-	TBD
2016 L RTP	Various	The creation of a culturally appropriate multi-route interconnected Yurok trail system network throughout the Reservation and nearby lands.	-	TBD
2016 L RTP	East Side Trail	East Side Trail	-	TBD
2016 L RTP	Berry Glen Trail	Berry Glen Trail	-	TBD
2016 L RTP	Skunk Cabbage North	Skunk Cabbage North	-	TBD
2016 L RTP	Redwood Creek Trail	Redwood Creek Trail	-	TBD
2016 L RTP	Tribal Office Tsunami Trail	Tribal Office Tsunami Trail	-	TBD
2016 L RTP	Requa Tsunami Trail	Requa Tsunami Trail	-	TBD
2016 L RTP	Klamath Glen Tsunami Trail	Klamath Glen Tsunami Trail	-	TBD

2016 LRTP	NA	Coastal Trail Implementation and Interpretation	-	TBD
2016 LRTP	Wautec to Klamath Glen Trail	Wautec to Klamath Glen Trail	-	TBD
2016 LRTP	Margaret Keating Trails	Margaret Keating Trails	-	TBD
2016 LRTP	River Transit Trails	River Transit Trails	-	TBD
2016 LRTP	Ke'Pel Head Start, Jack Norton, and Weitchpec School Trails	Ke'Pel Head Start, Jack Norton, and Weitchpec School Trails	-	TBD
2016 LRTP	High Country Cultural Trail	High Country Cultural Trail	-	TBD
<b>Safety</b>				
2016 LRTP	Various	Overall safety infrastructure improvements on the Reservation, including implementation of traffic control signs and maintenance of helipad sites.	-	TBD
2016 LRTP	Various	Traffic calming on Highway 169, Weitchpec Village, and Old Village Road including street trees and pedestrian bulbouts, enhanced crosswalks, etc.	-	TBD
2016 LRTP	Various	Street lighting on Klamath Boulevard, Salmon Road, Klamath Circle, and Silverside Circle.	-	TBD
<b>Emergency Access/Evacuation</b>				
2016 LRTP	NA	Drafting a Preliminary Study Report evaluating potential emergency access and evacuation needs of the Reservation	-	TBD
2016 LRTP	Various	Employ adequate signage of public roads, access facilities, and private drives at intersection and appropriate locations throughout the reservation. Culturally appropriate signs designed with both traditional local Yurok place names and current road names in English would be the preferable alternative.	-	TBD
2016 LRTP	NA	Pursue negotiations with Green Diamond Resource Company to acquire future emergency response, disaster relief, and community evacuation access agreements for the entire Yurok Reservation.	-	TBD
2016 LRTP	NA	Identify and pursue negotiations with other landowners to acquire future emergency response, disaster relief, and community evacuation access agreements for the entire Yurok Reservation.	-	TBD
2016 LRTP	NA	Distribute the Emergency Access Route System map to all partnering agencies that are responsible for emergency response within and surrounding the Yurok Reservation.	-	TBD
2016 LRTP	NA	Establish an emergency road maintenance fund to clear and repair roads impacted by winter storms for health, safety, and welfare of the Yurok Tribe.	-	TBD
2016 LRTP	Various	Establish a comprehensive geo-coding system for all residences, facilities, and other important locations throughout the reservation.	-	TBD
<b>Environmental</b>				
2016 LRTP	Various	Improve all drainage structures and culverts on Reservation to ensure fish passage where necessary	-	TBD

### **OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (E.G., PERMITS, ETC.)**

The Del Norte Local Transportation Commission will be the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of the California Environmental Quality Act (CEQA), Section 15050. No specific permits are required by any other responsible or trustee agencies to approve the proposed project. However, there are numerous permits and approvals that may be required to implement the improvements identified in the RTP. The following additional agency approvals apply to the proposed project: County of Del Norte, City of Crescent City, California Transportation Commission (CTC), and California Department of Transportation (Caltrans).

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## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would have potentially significant impacts as a result of development of this project, as described on the following pages.

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology and Soils		Greenhouse Gasses		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities and Service Systems		Wildfire		Mandatory Findings of Significance

## DETERMINATION

On the basis of this initial evaluation:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
X	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Signature

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Date

## EVALUATION INSTRUCTIONS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and

- b) The mitigation measure identified, if any, to reduce the impact to less than significant.

## EVALUATION OF ENVIRONMENTAL IMPACTS

In each area of potential impact listed in this section, there are one or more questions which assess the degree of potential environmental effect. A response is provided to each question using one of the four impact evaluation criteria described below. A discussion of the response is also included.

- **Potentially Significant Impact.** This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.
- **Less than Significant With Mitigation Incorporated.** This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
- **Less than Significant Impact.** A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- **No Impact.** These issues were either identified as having no impact on the environment, or they are not relevant to the project.

## ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 21 environmental topic areas.

### I. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

#### Responses to Checklist Questions

**Response a-c):** Views of scenic resources, scenic water resources, and other scenic resources in the county are available from highways and roadways, including scenic roads and corridors, throughout the county. Improvements to existing infrastructure may result in modification of the foreground of the various scenic viewsheds throughout the county.

There is also potential for individual improvement projects to affect scenic vistas and resources or degrade the visual character of the area. Examples would include improvement projects that are located adjacent to a broad viewshed such as the mountain ranges, valleys, ridgelines, or water bodies along roadways, or adjacent to the focal point of the forefront of the broad viewshed, such as visually important trees, rocks, or historic buildings. An impact would occur if a project would change the view to the middle ground or background elements of the broad viewshed, or remove the visually important trees, rocks, or historic buildings in the foreground.

While individual projects are not anticipated to significantly disrupt mid-ground or backdrop views of scenic vistas, individual projects have not yet been designed and may involve features, such as sound walls, grading, or structures that may disrupt views. These projects may involve removal of trees or other visually significant features, or may result in development that would cause an intermittent interruption in views to users of the highways, roadways, and other components of the transportation system. Individual projects could also convert areas of open space to developed uses, resulting in a permanent change in views.

The City of Crescent City has an abundance of visual resources, most notably, areas associated with the Pacific Ocean and the Battery Point Lighthouse. The City staff conducted a Coastal Resources Survey as part of their General Plan process (2001) that indicated coastal vista points, coastal scenic view corridors, and the Battery Point Lighthouse as scenic resources. The General Plan notes additional Scenic Resources including:

- City Gateways
  - Highway 101 South between Anchor Way and Elk Creek,
  - Highway 101 North Between Parkway Drive and Cooper Street, and
  - Front Street between “N” Street and “A” Street.
- Scenic Drives
  - Harbor Drive – from Anchor Way through the harbor to Highway 101 to Front Street to the B Street Pier/Battery Point Lighthouse,
  - Lighthouse-to-Lighthouse Drive – from Battery Point Lighthouse to 5<sup>th</sup> Street west to Pebble Beach Drive and north to the Washington Boulevard/Pt. St. George area.

The unincorporated De Norte County also has an abundance of visual resources, and the General Plan provides a list of Coastal Scenic Viewpoints and Scenic Corridors in General Plan Table 6-1. The scenic areas include:

- Oregon border to the mouth of the Smith River
- Smith River Bottomlands
- Lake Earl Area
- Pt. St. George to Crescent City
- Crescent City to Redwood National Park
- False Klamath Cove Area
- Lower Klamath River Area

Both, the Del Norte County General Plan (2003) and the City of Crescent City General Plan (2001), have policies and standard measures related to the protection of scenic resources (vistas, corridors, highways, drives, etc.). These policies and standard measures will ensure that projects include design measures to avoid adverse impacts to scenic resources. Implementation of these policies and standard measures would reduce the impact to a *less-than-significant* level.

**Response d):** There is a potential for an individual project under the RTP to create new sources of light and glare near sensitive receptors. Examples would include projects that require new roadway lighting, lit signs, and/or construction lighting. The design process would ensure that projects are designed to meet minimum safety and security standards and to avoid spillover lighting to sensitive uses. Design could include luminaries that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties and undeveloped open space. Fixtures that project light upward or horizontally will not be used. Luminaries will be shielded and directed away from habitat and open space areas adjacent to the project site. Implementation of these standard measures would reduce this impact to a *less-than-significant* level.

## II. AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?			X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?			X	
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

### Responses to Checklist Questions

**Response a):** The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response b):** The RTP includes improvements to the transportation systems throughout the county. Transportation improvements proposed are compatible with agricultural and timber zoning and do not conflict with the active Williamson Act Contracts. Agricultural and timber operations throughout the county would benefit from improved movement of their commodities from the resource to the marketplace as a result of the improvements to the transportation systems. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response c-d):** The RTP includes improvements to the transportation systems throughout the county, including the areas with timber resources. Transportation improvements proposed are compatible with the zoning of the timber area. Timber operations throughout the county would benefit from improved movement of the timber from the forest as a result of the improvements to the transportation systems. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response e):** The RTP does not involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use, or

conversion of forest land to non-forest use. The proposed project will have a ***less than significant*** impact on agricultural or forest lands or operations.



### III. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

#### Responses to Checklist Questions

#### Responses a-d):

#### Air Quality Conformity

Air quality in Del Norte County is generally good, due to low population density, a limited number of industrial and agricultural installations and low levels of traffic congestion. Del Norte County is included in the North Coast Air Basin and is federally unclassified or in attainment for all criteria pollutants.

#### Isolated Rural Area

A finding of conformity is required under Clean Air Act section 176(c) (42 U.S.C. 7506 (c)) to ensure that federally supported highway and transit project activities are consistent with (“conform to”) the State Implementation Plan (SIP). Conformity ensures that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the relevant national ambient air quality standards. Additionally, SIPs in California are developed to ensure conformity with the State ambient air quality standards.

While regional transportation conformity findings are required to approve RTPs in most places, they are not required for isolated rural areas, which includes the Del Norte Local Transportation Commission. Del Norte County is not part of an MPO, and regional planning is performed in part by Caltrans and the Del Norte Local Transportation Commission. RTP and TIP conformity requirements do not imply, instead regional conformity is done at the project level.

While the RTP provides improvements that will enhance the transportation system, it should be noted that it does not cause any increase in population or VMT. [It is noted that VMT is anticipated to increase over the planning horizon as a result in trips/trip lengths that originate outside Del Norte County and travel to, or through, the planning area; however, this VMT is not attributed to the residents of Del Norte County, or the RTP policies, financing programs, or actions.](#) Implementation of the RTP will not conflict with the Air Quality Plan, cause a violation of Air Quality Standards, contribute substantially to an existing air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant in a nonattainment area. Therefore, this impact is considered **less than significant**.

## Construction Emissions

Del Norte County is designated as attainment or unclassified for all criteria pollutants at the state and federal level. Construction activities associated with construction and implementation of the various roadway and other transportation improvement projects identified in the RTP would result in temporary short-term emissions associated with vehicle trips from construction workers, operation of construction equipment, and the dust generated during construction activities. These temporary and short-term emissions would generate additional ozone precursors (ROG and NO<sub>x</sub>), however, it would not be at a level that would cause the County to become non-attainment for any criteria pollutants.

All individual projects would be subject to the Air District Regulations and Rules related to all project construction sites. This includes dust abatement strategies and best management practices that significantly reduce PMs from being generated during construction. Compliance with the Air District's Regulations and Rules will ensure that short-term air quality impacts are reduced to a *less than significant* level.

## Localized Carbon Monoxide

~~Del Norte County is designated unclassified for CO at the state federal level. The RTP projects are designed to improve traffic flows and reduce congestion system-wide, reducing the potential for CO "hot spots" that can occur from exhaust of idling cars waiting to clear a heavily congested intersection or crossing. The RTP projects are intended to reduce congested conditions throughout the system while accommodating additional traffic generated by the increase in population projected for Del Norte County. Del Norte County does not have major congestion problems, which are generally the source of CO hot spots. Due to the lack of congestion, Del Norte County is designated unclassified for CO at the state federal level.~~

It is noted that the population of Del Norte County is projected to decrease by 4.0% between 2020 and 2040, which translates to an average annual decrease of 0.2%. Over the 20-year lifetime of the Regional Transportation Plan, the population of 24,528 is expected to decrease to 23,542 by 2040. With low traffic volumes and a decreasing population, expanding the traffic capacity of roadways in Del Norte County is not a priority. Safety and operational improvements and maintenance of the existing system to ensure connectivity are of central importance. As such, the RTP projects are designed to improve safety, maintain regional roadways, and ensure connectivity to Humboldt County, Curry County and Josephine County.

The potential for CO hot spots in Del Norte County is highly unlikely do to the existing traffic conditions, which lacks congestion, as well as the anticipated decrease in population over the planning horizon. This is considered a *less than significant* impact.

## Asbestos Hazards

Based upon the regional nature of the RTP, development of detailed, site-specific information on this impact at an RTP planning level is not feasible. The implementing agency will conduct appropriate project-level assessments and will be responsible for consideration of mitigation measures for significant effects on the environment. If asbestos is deemed present naturally, or in existing facilities, an Asbestos Hazard Dust Mitigation Plan would be prepared to ensure that adequate dust control and asbestos hazard mitigation measures are implemented during project construction. This standard practice is consistent with CARB's asbestos airborne toxic control measure (ATCM) (Title 17, CCR § 93105 and 93106) and would ensure that any construction activities that may result in the release of asbestos would include appropriate measures to ensure that exposure to construction workers and the public is minimized to

acceptable State and local levels. Implementation of this standard measure would ensure that this potential impact is reduced to a *less-than-significant* level.

**Responses e):** Implementation of the RTP would not directly create or generate objectionable odors. Persons residing in the immediate vicinity of proposed improvements may be subject to temporary odors typically associated with roadway construction activities (diesel exhaust, hot asphalt, etc.). However, any odors generated by construction activities would be minor and would be short and temporary in duration. This is considered a *less than significant* impact.

#### IV. BIOLOGICAL RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

#### *Responses to Checklist Questions*

**Response a):** According to California Natural Diversity Data Base (CNDDDB) search, there are 99 special status plant species documented in Del Norte County. This includes two federal/state endangered species, and one state rare species. All 99 species have a CNPS designation.

According to California Natural Diversity Data Base (CNDDDB) search, there are 60 special status animal species documented in Del Norte County. This includes 14 federal and/or state endangered/threatened/candidate listing. The special status animals with a federal and/or state listing include: 1 amphibian, five birds, four fish, two insects, and two mammals.

These species are presumed present at any given time throughout their habitat range. Some species require localized micro-habitats, while others are highly mobile and may occur throughout the County. Many of the documented special-status species may be directly or indirectly affected by RTP projects within the County if the improvements are to encroach on the species' habitat, or movement corridors.

Construction and maintenance activities associated with the individual projects could result in the direct loss or indirect disturbance of special-status wildlife species or their habitats that are known to occur, or have potential to occur, in the County. Impacts on special-status wildlife species or their habitat could result in a reduction in local population size, lowered reproductive success, or habitat fragmentation. Potential effects on special-status wildlife species associated with individual projects include:

- increased mortality caused by higher numbers of automobiles on new or widened roads;
- direct mortality from the collapse of underground burrows, resulting from soil compaction;
- direct mortality resulting from the movement of equipment and vehicles through the Project area;
- direct mortality resulting from removal of trees with active nests;
- direct mortality or loss of suitable habitat resulting from the trimming or removal of obligate host plants;
- direct mortality resulting from fill of wetlands features;
- loss of breeding and foraging habitat resulting from the filling of seasonal or perennial wetlands;
- loss of breeding, foraging, and refuge habitat resulting from the permanent removal of riparian vegetation;
- loss of suitable habitat for vernal pool invertebrates resulting from the destruction or degradation of vernal pools or seasonal wetlands;
- abandoned eggs or young and subsequent nest failure for special-status nesting birds, including raptors, and other non-special status migratory birds resulting from construction-related noises;
- loss or disturbance of rookeries and other colonial nests;
- loss of suitable foraging habitat for special-status raptor species; and
- loss of migration corridors resulting from the construction of permanent structures or features.

The design process for each improvement will involve a level of field reconnaissance to precisely identify the potential for impacts to special status species and to identify project specific design measures that can be employed to avoid or lessen an impact. Project specific design measures may include alternative designs to avoid habitats that are considered more sensitive and required for special status species. An impact would occur if a project would result in a take of a special status species or their habitat. If a project would in fact result in a take of a special status species or their habitat it may be required to go through a consultation process with the US Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW) for recommendations to avoid or lessen the impacts to these species and their habitats.

Permits may also be required from the USFWS and/or CDFW, and possibly by the local governments if a project design cannot avoid disturbance to special status species or their habitat. Permits are issued by regulatory agencies with conditions that are designed to mitigate the impact to the extent practicable. The proposed project does not directly cause an impact to special status species and the design process for individual improvements listed in the proposed project would require that each project be consistent with the policies that are

established in the Del Norte County General Plan for the purpose of protecting biological resources, including special status species that their habitat.

Consistency with the local policies as well as adopted federal and state regulations that protect special-status species, including their habitat and movement corridors, would ensure that appropriate design measures, including avoidance, if appropriate, are incorporated into the design of each improvement project. Because the proposed project is a planning document and thus, no physical changes will occur to the environment, adoption of the proposed project would not directly impact the environment. There is a possibility that special status species will be affected by a transportation project identified in the proposed project due to the extent of special status species throughout the region. The following mitigation measure would ensure that all future projects are designed to avoid sensitive biological resources to the greatest extent feasible. Where full avoidance is not possible, the participation in pre-established habitat and special status species protection programs would reduce the impact. Implementation of the following mitigation measure would reduce the impact to a **less than significant** level.

***Mitigation Measure 1:** Prior to final design approval of RTP projects, take steps to identify and protect any biological resources associated with the project. The implementing agency should retain a qualified biologist to conduct a field reconnaissance of the limits of the project area to identify special status plants, animals, and their habitats, as well as protected natural communities including wetland and terrestrial communities. If the biologist identifies protected biological resources within the limits of the project area, consider alternative designs that seek to avoid and/or minimize impacts to the biological resources. If the project cannot be designed to completely avoid, coordinate with the appropriate regulatory agency (i.e. USFWS, NMFS, CDFW, ACOE) to obtain regulatory permits and implement project-specific mitigation prior to any construction activities.*

**Response b-c):** The County contains a variety of natural communities that are generally considered sensitive, such as riparian, hardwood forest, conifer forests, streams, rivers, wet meadows, and vernal pools. Streams, rivers, wet meadows, and vernal pools (wetlands and jurisdictional waters) are of high concern because they provide unique aquatic habitat (perennial and ephemeral) for many endemic species, including special-status plants, birds, invertebrates, and amphibians. These aquatic habitats oftentimes qualify as protected wetlands or jurisdictional waters and are protected from disturbance through the Clean Water Act (CWA).

The County contains numerous aquatic habitats that qualify as federally protected wetlands and jurisdictional waters. Section 404 of the CWA requires any project that involves disturbance to a wetland or water of the U.S. to obtain a permit that authorizes the disturbance. If a wetland or jurisdictional water is determined to be present, then a permit must be obtained from the US Army Corps of Engineers (USACE) to authorize a disturbance to the wetland. Although subsequent improvements may disturb protected wetlands and/or jurisdictional waters, the regulatory process that is established through Section 404 of the CWA ensures that there is “no net loss” of wetlands or jurisdictional waters. If, through the design process, it is determined that an improvement project cannot avoid a wetland or jurisdictional water, then the USACE would require that there be an equal amount of wetland created elsewhere to mitigate any loss of wetland.

The County contains five sensitive natural communities including: Coastal and Valley Freshwater Marsh, Coastal Brackish Marsh, Darlingtonia Seep, Northern Coastal Salt Marsh, and Upland Douglas Fir Forest.

Construction activities associated with individual projects will occur across a variety of habitats and such activities could result in the disturbance to the habitat. There is a possibility that natural communities, including wetlands, riparian, sensitive natural communities, will be affected by individual projects.

Detailed plans of the individual projects have not been developed. Consistency with the applicable local policies and federal and state regulations would ensure that appropriate design measures, including avoidance, if appropriate, are incorporated into the design of each improvement project. Because the proposed project is a planning document and thus, no physical changes will occur to the environment, adoption of the proposed project would not directly impact the environment. Implementation of the previously presented mitigation measures would ensure that all future individual projects are designed to avoid sensitive habitat to the greatest extent feasible. Where full avoidance is not possible, the participation in pre-established habitat protection programs or state/federal permit mitigation programs would offset any potential impacts associated with project implementation. Adherence to the requirements in mitigation measures would reduce this impact to a *less than significant* level.

**Response d):** There are native fish and wildlife species within the County that migrate or utilize movement corridors and nursery sites (i.e. rivers, streams, forests). Linear transportation improvements can cause fragmentation of habitat where species can no longer easily move through an area. This would occur in cases where a linear transportation improvement includes a center barrier to be erected that suddenly affects the ability of a smaller animal, and sometimes, less mobile species, to cross the linear transportation corridor to areas that they previously frequented. In addition, certain fence designs are barriers to deer and elk movement, particularly to does/fawns and cow/calf. Deer/elk-proof or resistant fences around large acreages in their range and across critical movement corridors result in a significant adverse impact on these animal populations. Also, the creation of highways and roads are a source of wildlife mortality.

Construction and maintenance activities associated with the individual projects could result in the direct loss or indirect disturbance of movement habitats that occur in the County. The design process for each improvement will involve a level of field reconnaissance to precisely identify the potential for impacts to and to identify project specific design measures that can be employed to avoid or lessen an impact. Project specific design measures may include alternative designs to avoid habitats that are considered more sensitive. If a project would in fact result in an impact to migration or nursery habitat it may be required to go through a consultation process with the USFWS and/or CDFW for recommendations to avoid or lessen the impacts to these species and their habitats.

Consistency with the local policies as well as adopted federal and state regulations that protect nursery habitat and movement corridors, would ensure that appropriate design measures, including avoidance, if appropriate, are incorporated into the design of each improvement project. Because the proposed project is a planning document and thus, no physical changes will occur to the environment, adoption of the proposed project would not directly impact the environment.

The individual projects have not been designed or approved. Each project will be designed consistent with the applicable local policies to ensure that appropriate design measures are incorporated into the design of each project. The following mitigation measure would ensure that all future projects are designed to facilitate the movement of wildlife to the greatest extent feasible. Where full design mitigation is not feasible, compliance with state and federal permit

requirements would offset any potential impacts associated with project implementation. Adherence to the requirements this mitigation measure would reduce this impact to a ***less than significant*** level.

***Mitigation Measure 2:*** *Prior to design approval of individual projects, the implementing agency will incorporate economically viable design measures, as applicable and necessary, to allow wildlife (terrestrial and/or aquatic) to move through the transportation corridor, both during construction activities and post construction. Potential measures should include appropriately spaced breaks in a center barrier, and other measures that are designed to allow wildlife to move through the transportation corridor.*

**Response e):** The proposed project does not conflict with local policies or ordinances protecting biological resources. Implementation of the proposed project would have ***no impact*** relative to this issue.

**Response f):** Del Norte County shows one habitat conservation plan for the Green Diamond Resource Company California Timberlands & Northern Spotted Owl (formerly Simpson Timber Company). This was a 30-year HCP covering 400,000 acres of forest land, a portion of which is in Del Norte County. The HCP is set to expire in 2022, unless renewed. There are no NCCPs in Del Norte County. Implementation of the proposed project would have ***no impact*** relative to this issue.



## V. CULTURAL RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

### *Responses to Checklist Questions*

**Response a):** Implementation of RTP projects may occur near or in close vicinity to architectural resources (buildings/structures/features) that are 50 years old or older. Given the age of these resources, it is possible they are historically significant and eligible for listing in the California Register of Historic Resources (CRHR) or the National Register of Historic Places (NRHP). As RTP projects are designed and reviewed by local jurisdictions, the RTP projects will undergo technical analysis to evaluate any potential impacts to historical resources within their area of potential effect.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at this planning level is not feasible. However, damage to or destruction of historical resources that are considered significant under local, state, or federal criteria would be a significant impact. Implementation of the following mitigation measure would ensure that all subsequent RTP projects either avoid known historical resources, or take steps to implement amelioration methods to reduce impacts to known historical resources. This mitigation measure would also require investigations and avoidance methods in the event that a previously undiscovered historical resource is encountered during construction activities. This mitigation measure would reduce this impact to a ***less than significant*** level.

***Mitigation Measure 3:*** *During environmental review of individual projects, and prior to construction, if architectural resources are deemed as potentially eligible for the California Register of Historic Resources or the National Register of Historic Places as determined by a qualified architectural historian, the implementing agency should consider avoidance through project redesign as feasible. If avoidance is not feasible, the historic resource should be formally documented through the use of large-format photography, measured drawings, written architectural descriptions, and historical narratives. The documentation should be entered into the Library of Congress, and archived in the California Historical Resources Information System. In the event of building relocation, ensure that any alterations to significant buildings or structures conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.*

**Response b):** Implementation of most of the RTP improvements would be constructed within the existing rights-of-way. Improvements and modifications within existing rights-of-way would have less potential to encounter previously unknown archaeological resources relative to projects in undisturbed areas since the former right-of-way areas have already been disturbed. Improvements and modifications within existing rights-of-way still have potential to adversely affect archaeological resources, either directly or indirectly.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at this planning level is not feasible. As RTP projects are designed

and reviewed by local jurisdictions, the RTP projects will undergo technical analysis to evaluate any potential impacts to cultural resources within their area of potential effect. This will include consultation with the Native American Heritage Commission to determine whether known sacred sites are in the project area. If recommended, a qualified archaeologist will be consulted to conduct archaeological surveys. The significance of any resources that are determined to be in the project area will be assessed according to the applicable local, state, and federal significance criteria.

Implementation of the following mitigation measure would ensure that all subsequent RTP projects either avoid known cultural or historical resources, or take steps to implement amelioration methods to reduce impacts to known cultural or historical resources. It would also require investigations and avoidance methods in the event that a previously undiscovered cultural or historical resource is encountered during construction activities. This mitigation measure would reduce this impact to a ***less than significant*** level.

***Mitigation Measure 4:*** *If cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) are discovered work shall be halted immediately within 50 meters (165 feet) of the discovery, the implementing agency shall be notified, and a qualified archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to determine the significance of the discovery.*

*The implementing agency shall consider mitigation recommendations presented by the professional archaeologist for any unanticipated discoveries and shall carry out the measures deemed feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.*

**Response c):** Indications are that humans have occupied Del Norte County for at least 10,000 years and it is not always possible to predict where human remains may occur outside of formal burials. Therefore, excavation and construction activities, regardless of depth, may yield human remains that may not be interred in marked, formal burials. Under CEQA, human remains are protected under the definition of archaeological materials as being “any evidence of human activity.” Additionally, Public Resources Code Section 5097 has specific stop-work and notification procedures to follow in the event that human remains are inadvertently discovered during Project implementation. Consistency with state law and standard County procedures would reduce this impact to a ***less than significant*** level.

## VI. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

### Responses to Checklist Questions

**Responses a), b):** In Del Norte County, electricity is provided by Pacificorp. Many residents and businesses in the County also rely on propane gas provided by a number of local franchises, as an energy source.

Pacificorp sponsors several energy conservation programs that include education, solar energy incentives, florescent lighting business program and a weatherization program for low income families. These services are intended to reduce energy consumption in homes through the replacement of inefficient appliances and minor housing repairs, making the home more energy efficient. Consumers also receive valuable educational materials that provide useful energy saving tips and information.

Additional conservation measures can be encouraged through programs and policies that address areas within the County that can potentially reduce energy consumption by reducing wasteful energy consumption practices and habits.

Implementation of the proposed project would not result in new development, so there would be no development related energy needs generated by the proposed project. The transportation related energy needs [for Del Norte County residents will decrease as a result of the decrease in population, and the decrease in total VMT by residents. However, this decrease in energy needs by County residents is more than offset by an anticipated increase in VMT from trips/trip lengths that originate outside of the County by visitors traveling to, or through, Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. These additional trips will result in additional energy demands for those trips. The total VMT increase is anticipated to be 0.52% per year, which will result in an equivalent energy increase. are largely unchanged given that VMT has only a slight change, coupled with the fact-I is noted](#) that fuel efficiency is increasing based on fuel standards that are being phased in over the next decade [and these trips originating outside the County are anticipated to benefit from those new standards. As a result energy demands are anticipated to have an annual increase that is lower than the 0.52% annual increase in VMT.](#)

Construction emissions will continue as projects are constructed; however, fuel efficiency standards and cleaner fuels for construction equipment are also being phased in and are anticipated to improve over the next decade.

Overall, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project operation of the plan, or during construction of individual projects. Additionally, the proposed project does not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Implementation of the proposed project would have a *less than significant* impact relative to this topic.

## VII. GEOLOGY AND SOILS

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

### *Responses to Checklist Questions*

**Responses a.i-ii):** Del Norte County is not located within an Alquist-Priolo Earthquake Fault Zone. While these faults are no known active, or potentially active faults in the County, California is considered seismically active and a regional earthquake, even one outside the County, could result in several seismic-related effects. All projects would be required to conduct seismic hazard evaluations and comply with all appropriate Building Code provisions. The County would require individual projects to include appropriate seismic designs to accommodate the potential for seismicity. This standard measure would reduce this impact to a ***less than significant*** level.

**Response a.iii-iv), c):** Liquefaction typically requires a significant sudden decrease of shearing resistance in cohesionless soils and a sudden increase in water pressure, which is typically associated with an earthquake of high magnitude. From a regional perspective, the soils located within the County are generally considered to have a low potential for liquefaction given that there are no active faults; however, the highest risk for liquefaction is expected along rivers, creeks, and drainages within the County.

There are areas throughout the County that are prone to landslides. A higher probability of landslides in some areas is predominately based on the steeper slopes. There will be an ongoing potential for these steep areas of the County to be or become unstable and result in landslides at some time.

The implementing agency would require each improvement project to have a specific geotechnical study prepared and incorporated into the improvement design. The geotechnical study would identify specific soil conditions, surface and subsurface drainage capability, slope steepness, and other factors that may contribute to landslide risk as well as soil inclusions that pose a higher risk of liquefaction. The geotechnical study would provide recommendations for mitigating any potential risk associated with site specific conditions. Implementation of the RTP itself would result in a *less-than-significant* impact on soil erosion.

**Responses b):** There are areas throughout the County that have steeper slopes where the potential for loss of topsoil and erosion is relatively high. Some of the individual projects would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

The RWQCB requires a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area one acre or larger. The SWPPPs will include project specific best management measures that are designed to control drainage and erosion. Furthermore, each individual project will include detailed project specific drainage plans that control storm water runoff and erosion, both during and after construction. The SWPPP and the project specific drainage plans would reduce the potential for erosion. Implementation of the RTP itself would result in a *less-than-significant* impact on soil erosion.

**Responses d):** Expansive soils are those that shrink or swell with the change in moisture content. The volume of change is influenced by the quantity of moisture, by the kind and amount of clay in the soil, and by the original porosity of the soil. Shrinking and swelling can damage roads and other structures unless special engineering design is incorporated into the project plans.

Each individual project would be required to have a specific geotechnical study prepared and incorporated into the design. The geotechnical study would identify the specific soil conditions that may contribute to soil expansion. Based on specific findings at each locality, the geotechnical engineer will recommend detailed engineering measures that are necessary to reduce the risks associated with soil expansion. Implementation of project specific geotechnical engineering measures would reduce the risks from soil expansion to a reasonable level for individual projects. Implementation of the RTP itself would result in a *less-than-significant* impact on soil expansion.

**Responses e):** The RTP would not result in the generation of sewer water or the expansion of septic infrastructure. Implementation of the proposed project would have ***no impact*** on this environmental issue.

**Responses f):** Most of the RTP improvements would be constructed within the existing rights-of-way, which is generally considered to have less potential to encounter previously unknown paleontological resources relative to projects in undisturbed/undeveloped areas. However, improvements and modifications within existing rights-of-way still have the potential to damage or destroy undiscovered paleontological resources, especially during deeper excavations.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at this planning level is not feasible. However, damage to or destruction of paleontological resources that are considered significant under local, state, or federal criteria would be a significant impact.

During environmental review of RTP projects, implementing agencies will take steps to identify and protect paleontological resources. When the project scope and/or location indicate potential impacts to paleontological resources, a qualified paleontologist would be retained to identify resources and potential impacts and to determine appropriate avoidance, minimization, and mitigation measures. This is considered a ***less than significant*** impact.

*VIII. GREENHOUSE GAS EMISSIONS*

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?			X	

*Responses to Checklist Questions*

**Responses a) and b):** California is dedicated to reducing greenhouse gas emissions through sustainable land use and transportation planning. In 2016, California Senate Bill 32 was passed, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. The transportation sector accounts for 37% of California's carbon emissions, prompting policy to reduce vehicle miles traveled. Subsequent legislation has been passed to support California's goals of GHG emissions reductions, such as Senate Bill 743 (SB 743), described in the following section, which has an impact on the RTP guidelines and the RTP development process. In 2017, transportation funding in California was changed with California Senate Bill 1 (SB 1), which is a \$52 billion transportation program funded by increased state gas taxes and vehicle license fees.

Senate Bill (SB) 743 (Steinberg, 2013) creates a process to change the way that transportation impacts are analyzed under the California Environmental Quality Act (CEQA). Specifically, SB 743 requires the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts. In 2018, the CEQA Guidelines were amended to include those alternative criteria, and auto delay (slowed traffic congestion) is no longer to be considered a significant impact under CEQA. Transportation impacts related to air quality, noise and safety must still be analyzed under CEQA where appropriate. SB 743 also amended congestion management law to allow cities and counties to opt out of LOS standards within certain infill areas. The updated 2017 RTP Guidelines have established vehicle miles traveled (VMT) as the metric to replace LOS.

In 2016, several bills that would drastically change the financial outlook for transportation funding for the next decade were debated within the State Legislature. The results of those legislative efforts culminated in the Governor's signing of Senate Bill 1 (SB1) on April 28, 2017.

SB 1 is a \$52 billion transportation plan funded by increased taxes on gasoline and diesel fuel, and vehicle license fees, including a new fee for vehicles that do not utilize fossil fuels, but do use the public roads. That new funding source will be used exclusively for transportation purposes, including maintenance, repair and rehabilitation of roads and bridges, new bicycle and pedestrian facilities, public transportation, and planning grants.

SB 1 created the following new and augmented programs that fall under California Transportation Commission (CTC) purview:

- Active Transportation Program (ATP) - \$100 million (80%) added annually for bicycle and pedestrian projects.
- Local Streets and Roads - \$1.5 billion added annually for road maintenance and rehabilitation.



- State Highway Operation and Protection Program (SHOPP) - \$1.9 billion added annually for projects on State Highways.
- State Transportation Improvement Program (STIP) – Funding source stabilized.

On September 23, 2020, Governor Newsom signed Executive Order N-79-20 establishing a State goal that 100% of in-state sales of new passenger vehicles and trucks will be zero-emissions by 2035. The Executive Order establishes a further goal 100% of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. Finally, the order sets a goal of the State of California to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible. Regional and local transit fleets are expected to adhere to the State goal of transitioning to zero emissions vehicles by 2035.

Del Norte County's population was 25,885 in 2015 and increased to 25,967 by 2019 at a minor increase of 0.32% in recent years. The population of Del Norte County is projected to decrease by 4.0% between 2020 and 2040, which translates to an average annual decrease of 0.2%. Over the 20-year lifetime of the Regional Transportation Plan, the population of 24,528 is expected to decrease to 23,542 by 2040.

~~Because of the rural nature of Del Norte County, the population decrease does not result in a VMT decrease. It is expected that VMT will increase minimally on Del Norte County roadways over the lifetime of the proposed project due to little or no population growth projected over the coming decades. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.~~

The population decrease does not result in a VMT decrease, however, instead it is expected that VMT will increase on Del Norte County roadways over the lifetime of the proposed project. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.

The prima facie assumption would be that per capita VMT increases by 13% per capita; however, it is critical to look deeper into the source of the VMT calculations to understand the source of the trips and trip lengths. The VMT calculations include vehicle miles traveled on state highways that travel through Del Norte County, including those that did not originate in Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. It is fully appropriate for the VMT analysis in the RTP to account for these trips and trip lengths even though they do not originate and are not attributable to the residents of Del Norte County. What this VMT analysis illustrates is that the desire for non-residents to travel to, or through, Del Norte County is anticipated to growth over the planning horizon, and as a result the total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.

**Table GHG-1 Projected Vehicle Miles Traveled**

<i>JURISDICTION</i>	<i>2020 DAILY VMT</i>	<i>2025 DAILY VMT</i>	<i>2030 DAILY VMT</i>	<i>2035 DAILY VMT</i>	<i>2040 DAILY VMT</i>
Crescent City	28.9	29.6	30.3	31.1	31.9
Bureau of Indian Affairs	5.3	5.3	5.3	5.4	5.4
Del Norte County	199.6	201.6	203.6	205.7	207.7
National Park Service	5.1	5.1	5.1	5.2	5.2
State Highways	539.0	552.6	566.6	580.9	595.6
State Park Service	30.3	30.5	30.6	30.8	30.9
U.S. Forest Service	75.8	77.3	78.9	80.4	82.1
<b>Total</b>	<b>885.6</b>	<b>908.0</b>	<b>930.9</b>	<b>954.4</b>	<b>978.5</b>

SOURCE: DEL NORTE LOCAL TRANSPORTATION COMMISSION (2020)

The County does not have a GHG inventory, and is not subject to a GHG reduction target because it does not fall within a designated Metropolitan Planning Organization (MPO). The Del Norte Local Transportation Commission's ability to address and mitigate climate change impacts is limited primarily to policy and funding decisions related to planned roadway and alternative transportation improvements. As described above, the combustion of fossil fuels during vehicle operations is the primary source of greenhouse gas (GHG) emissions in California, and it represents about a third of the GHG emissions in most areas. GHG emissions also result from the carbon dioxide, methane, and nitrous dioxide that are released during the combustion of gasoline and diesel fuel in construction equipment, vehicles, buses, trucks, and trains; and the use of natural gas to power transit buses and other vehicles.

Del Norte County has experienced slow growth in population and employment over the past two decades and is forecast to decline in population into the future. The County will continue to monitor population and employment and VMT growth consistent with the RTP, RTP performance measures, and local General Plans. [As discussed above, total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.](#)

This planning document recognizes that TDM and alternative mobility options, including walking, biking and transit require coordination with land use decisions and improved infrastructure. To this degree, the goals and policies in the RTP are still consistent with the County's General Plan to provide a balanced multi-modal transportation system that includes non-auto choices for access and mobility. Caltrans, the County, the City of Crescent City, and tribal governments are committed to implementing policies and strategies to reduce reliance on motorized vehicles where possible.

As discussed above, implementation of the RTP will not conflict with AB 32 or SB 375. Furthermore, the RTP does not result in any significant amount of VMT or population growth. Therefore, this impact is considered **less than significant**.

## IX. HAZARDS AND HAZARDOUS MATERIALS

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

### *Responses to Checklist Questions*

**Response a):** Construction of the individual RTP projects may involve the transportation, use, and/or disposal of hazardous materials, which may involve the use of equipment that contains hazardous materials (e.g., solvents and fuels, diesel-fueled equipment), or the transportation of excavated soil and/or groundwater containing contaminants from areas that are identified as being contaminated. However, the transportation of hazardous materials is heavily regulated and monitored by federal, state, and local regulations and policies. All transportation of hazardous materials, if any, will be required to comply with all existing regulations and policies. Compliance with all existing regulations and policies would ensure that the impact would be *less than significant*, and no additional mitigation is required.

### **Response b):**

**Hazardous Solvents and Architectural Coatings:** The construction and maintenance of individual RTP projects would involve the use of fuels, solvents, architectural coatings, and other chemicals that may be considered hazardous if not properly used. Typically, “leftover”

materials are used on other projects when possible. In any case, the handling and disposal of these products would be governed according to regulations enforced by local fire departments, Certified Unified Program Agencies (CUPAs), the State Division of Occupational Safety and Health, and the Department of Toxic Substances Control. In addition, regulations under the federal and state Clean Water Act require contractors to avoid allowing the release of materials into surface waters. Compliance with the existing regulatory environment would ensure that this impact would be *less than significant*.

**Asbestos:** The construction of RTP projects within areas that are known to have naturally occurring asbestos, or areas where asbestos is contained with existing structures, could lead to the disturbance and release of asbestos fibers. Earthmoving, excavation, and demolitions of materials containing asbestos requires monitoring to ensure that they are not used as soil or fill materials, and that they are properly disposed of in accordance with federal and state regulations.

**Conclusion:** Based upon the regional nature of the RTP, development of detailed, site-specific information on this impact at an RTP planning level is not feasible. The implementing agency of each RTP project will conduct appropriate project-level assessments and will be responsible for consideration of mitigation measures for significant effects on the environment. If asbestos is deemed present, an Asbestos Hazard Dust Mitigation Plan would be prepared to ensure that adequate dust control and asbestos hazard mitigation measures are implemented during project construction. At the project level environmental review, any applicable mitigation measures presented in the Air Quality section of the environmental impact report would ensure that this potential impact is reduced to a *less than significant* level.

**Response c):** Because of the regional nature of the transportation improvements, some will inevitably be located within ¼ mile of a school. Hazardous materials used in construction of an RTP project in the vicinity of a school, or other sensitive receptors such as hospitals and residences, could be accidentally released. In the event of a hazardous materials spill or release, notification and cleanup operations would be performed in compliance with applicable federal, state, and local regulations and policies, including hazard mitigation plans. Compliance with all existing regulations, policies, and hazard mitigation plans would ensure that the impact would be *less than significant*, and no additional mitigation is required.

**Response d):** Any construction activities on, through or adjacent to contaminated sites could lead to a disturbance and release of hazardous materials. The regulatory agencies, including federal, state, and local agencies, have identified sites that are or were contaminated at some point. Additionally, these agencies continue to pursue investigating properties that could potentially be contaminated and all information is maintained in a database system. Based upon the regional nature of the RTP, development of detailed, site-specific information on this impact at an RTP planning level is not feasible. As a standard best management practice, the implementing agency of each RTP project will conduct appropriate project-level environmental review and will be responsible for consideration of mitigation measures for significant effects on the environment. This would involve the preparation of a Phase 1 ESA, and possibly a Phase 2, to determine if the individual site is contaminated. Implementation of this standard practice would ensure that this potential impact is reduced to a *less than significant* level.

**Response e):** Hazards related with airports are typically grouped into two categories: air hazards and ground hazards. Air hazards jeopardize the safety of an airborne aircraft and expose passengers, pilots and crews to danger. Examples of air hazards include tall structures, glare-producing objects, bird and wildlife attractants, radio waves from communication centers,

or other features that have the potential to interfere with take-off or landing procedures, posing a risk to aircraft. Ground hazards jeopardize the safety of current and future residents and/or workers in the vicinity of an airport. The most obvious ground hazard is a crash, which may produce a serious, immediate risk to those residing in or using areas adjacent to the airport. Most accidents occur during take-off and landing. Therefore, the higher the density around an airport, including transportation facilities, the higher the risk associated with this type of hazard.

Jack McNamara Field is the primary airport in Del Norte County, and the only airport in the county to offer commercial flights. Flights are available at Jack McNamara Field, with daily round-trip flights between Crescent City and Oakland. Current prices range from around \$200 - \$240 for a round-trip flight and around \$300 for same-week flights. From Oakland, travelers can connect to other destinations. The Jack McNama Field and other airport facility are described below.

**Jack McNamara Field:** Jack McNamara Field is located in unincorporated Crescent City and is operated by the Border Coast Regional Airport Authority (BCRAA). The BCRAA is a Joint Powers Authority with a Board of Directors comprised of representatives from Del Norte County, the City of Crescent City, the Elk Valley Rancheria, the Tolowa Dee-ni' Nation, the City of Brookings (Oregon), and Curry County (Oregon). In September 2015, the Del Norte County Regional Airport began offering commercial flights between Portland and Crescent City twice daily through a partnership with PenAir and Alaska Airlines. Del Norte County Regional Airport is the only airport to provide commercial airline passenger service and is the only airport with an Instrumental Landing System (ILS) in the County. It is eligible for FAA Primary Entitlement funding. One car rental company is located onsite. The total number of enplanements for the Del Norte County Regional Airport were relatively steady from 2010-2014; however, SkyWest Airlines withdrew from the market in April 2015 and enplanements dropped precipitously. Peninsula Airways began serving Crescent City on a code share agreement with Alaska Airlines to and from Portland International Airport in September 2015 and enplanements have been steadily increasing since.

**Other Airports:** In addition to the Del Norte County Regional Airport (Jack McNamara Field), the County has two other public airports. The Ward Field Airport in Gasquet and the Andy McBeth Airport in Klamath Glen.

- **Ward Field:** The Ward Field Airport is located between the Smith River and US 199 in the unincorporated community of Gasquet. Ward Field is a public general aviation non-NPAIS facility. This airport serves as an alternate landing for non-commercial aircrafts if Jack McNamara Field is fogged in. Additionally, the airport can be used in emergency situations, such as firefighting or medical evacuations. Redwood Coast Transit Route 199 serves the Gasquet Community and associatively, Ward Field Airport.
- **Andy McBeth:** The Andy McBeth Airport is located within the unincorporated community of Klamath Glen. The facility is a public general non-NPAIS facility with no services available. This airport is used primarily by private pilots and emergency responders.

Some of the RTP projects include improvements to the existing airports, and some are roadway improvements located within close proximity to airports. These improvements are transportation related and do not create residences, or other habitable structures within proximity to the airport, and they do not conflict with the airport land use plans within County.

The 2020 RTP would not adversely impact people residing or working within 2 miles of an airport. Improvements to transportation facilities near airport land uses airport facilities, is expected to improve the safety conditions at these airports through increased access and response. Therefore, there is *no impact*.

**Response f):** The individual RTP improvement projects would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, including tsunami evacuation routes. The RTP would improve transportation systems throughout the County, which is expected to improve the emergency response and evacuation routes throughout the County. Therefore, there is *no impact*.

**Response g):** The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

Wildfires are a major hazard in the State of California. Wildfires burn natural vegetation on developed and undeveloped lands including timber, brush, woodland, and grass fires. While low intensity wildfires have a role in the County's ecosystem, the intensity and frequency of wildfires is exacerbated due to extended droughts and climate change, and puts human health and safety, structures (e.g., homes, schools, businesses, etc.), air quality, recreation areas, water quality, wildlife habitat and ecosystem health, and forest resources at risk.

Del Norte County has areas with the appropriate fuel loading, and topography for wildfire. When this is combined with dry summers and higher temperatures, the risk of wildfire increases substantially. Most wildland fires are human caused, so areas with easy human access to land with the appropriate fire parameters generally result in an increased risk of fire.

The individual RTP improvement projects would not result in the construction of structures that would be occupied by humans; therefore, it would not expose people or structures to a significant risk involving wildfires. The RTP provides for improvements to transportation systems throughout the County, which is expected to improve the ability for fire protection services to access areas that have a high wildfire risk rating. Therefore, there is *no impact*.

## X. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;		X		
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;		X		
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or		X		
(iv) Impede or redirect flood flows?		X		
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?		X		
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		X		

### Responses to Checklist Questions

**Responses a), e): Construction-Related Water Quality Impacts:** Grading, excavation, removal of vegetation cover, and loading activities associated with construction activities could temporarily increase runoff, erosion, and sedimentation. Construction activities also could result in soil compaction and wind erosion effects that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas.

As required by the Clean Water Act, each specific improvement project will require an approved Storm Water Pollution Prevention Plan (SWPPP) that includes best management practices for grading, and preservation of topsoil. A SWPPP is not required if the project will disturb less than one acre. SWPPPs are designed to control storm water quality degradation to the extent practicable using best management practices during and after construction.

The implementing agency will submit the SWPPP with a Notice of Intent to the Regional Water Quality Control Board (RWQCB) to obtain a General Permit. The RWQCB is an agency responsible for reviewing the SWPPP with the Notice of Intent, prior to issuance of a General

Permit for the discharge of storm water during construction activities. The RWQCB accepts General Permit applications (with the SWPPP and Notice of Intent) after specific projects have been approved by the lead agency. The lead agency for each specific project that is larger than one acre is required to obtain a General Permit for discharge of storm water during construction activities prior to commencing construction (per the Clean Water Act).

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at this planning level is not feasible. However, each RTP project will include detailed project specific drainage plans that control storm water runoff and erosion, both during and after construction. The Regional Water Quality Control Board will require a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each transportation improvement that disturbs an area one acre or larger. The SWPPPs will include project specific best management measures that are designed to control drainage and erosion. The implementing agency will be required to coordinate the improvements with the RWQCB, Del Norte County, and other applicable agencies, and obtain the necessary permits. The implementing agency will also be required to develop projects consistent with all relevant water control plans and groundwater management plans. Implementation of the following mitigation measures would ensure that the RTP would have a **less than significant** impact from these issues.

### **Mitigation Measures**

**Mitigation Measure 5:** *Comply with NPDES General Construction Permit requirements. To reduce or eliminate construction-related water quality effects, the implementing agency will ensure that transportation improvement projects comply with the requirements of the NPDES General Construction Permit. Project implementation agencies are required to obtain coverage under the General Construction Permit before the onset of any construction activities, where the disturbed area is 1 acre or greater in size.*

*A SWPPP will be developed by a qualified engineer or erosion control specialist in accordance with the NPDES General Construction Permit requirements. The SWPPP will be implemented prior to the issuance of any grading permit before construction. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB.*

*Compliance and coverage under the NPDES General Construction Permit will require controls of pollutant discharges that utilize BMPs and technology to reduce erosion and sediments to meet water quality standards. BMPs may consist of a wide variety of measures taken to reduce pollutants in stormwater runoff from the construction site. Temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover. will be employed to control erosion from disturbed areas.*

*Final selection of BMPs will be subject to approval by the implementing agency. The implementing agency will verify that an NOI has been filed with the SWRCB, and a SWPPP has been developed before allowing construction to begin.*

**Mitigation Measure 6:** *Implement a Spill Prevention and Control Program. As part of requiring compliance with the NPDES General Construction Permit, the implementing agency and its agents will develop and implement a spill prevention and control program to minimize the potential for, and effects from, spills of hazardous, toxic, or petroleum substances during all construction activities. The program will be completed before any construction activities begin.*

**Mitigation Measure 7:** *Implement measures to maintain water quality after construction. The project implementing agencies will implement source and treatment control measures according to the County Stormwater Quality Program. General site design control measures are required to minimize the volume*



and rate of stormwater runoff discharge from the project site. General site design control measures incorporated into the project design can include:

- conserving natural areas;
- protecting slopes and channels;
- minimizing impervious areas;
- storm drain identification, and appropriate messaging and signing; and
- minimizing effective imperviousness through the use of turf buffers and/or grass-lined channels, if feasible.

In addition, projects must include treatment control measures, if possible and when feasible, to remove pollutants from stormwater runoff prior to discharge to the storm drain system or receiving water. Treatment control measures may include, but not be limited to, the following:

- Vegetated buffer strip
- Vegetated swale
- Extended detention basin
- Wet pond
- Constructed wetland
- Detention basin/sand filter
- Porous pavement detention
- Porous landscape detention
- Infiltration basin
- Infiltration trench
- Media filter
- Retention/irrigation
- Proprietary control device

Selection and implementation of these measures would be based on a project-by-project basis depending on project size and stormwater treatment needs.

**Dewatering Water Quality Impacts:** Some RTP projects, such as overpasses, underpasses, grade separations, highway interchanges, and other crossing structures could require excavation below the ground surface or support structures or foundations secured deep into the ground. Projects that excavate or secure foundations deep in the ground may encounter groundwater. Depending on the location, trenching and excavation associated with these projects may reach depths that can expose the water table and create a direct path to the groundwater basin for contaminants to enter the groundwater system. Primary construction-related contaminants that could reach groundwater would include oil and grease, and construction-related hazardous materials and dewatering effluent.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at this planning level is not feasible. However, each transportation RTP project will include detailed project specific geotechnical engineering that would identify the groundwater levels and the need for dewatering. If dewatering was deemed necessary after the appropriate engineering study then the implementing agency would obtain a Dewatering Permit from the Regional Water Quality Control Board and comply with provisions for dewatering. The implementing agency would also need to obtain an NPDES permit and Waste Discharge Requirement before discharging any dewatered effluent to surface water. Implementation of the following mitigation measure would ensure that the RTP would have a **less than significant** impact from these issues.

### *Mitigation Measures*

**Mitigation Measure 8:** *Comply with provisions for dewatering. Before discharging any dewatered effluent to surface water, the project implementation agency will obtain an NPDES permit and Waste Discharge Requirement from the RWQCB and/or the North Coast RWQCB, as appropriate. Depending on the volume and characteristics of the discharge, coverage under the NPDES General Construction Permit may be permissible. If coverage under the General Construction Permit is not allowed, the project will conform to requirements of the General Dewatering Permit, issued by the RWQCB and/or other applicable agencies. The project implementation agencies will design and implement measures as necessary so that the discharge limits identified in the relevant permit are met.*

**Response b):** Individual RTP projects, such as road widenings, interchange reconstruction, and other projects would result in new impervious surfaces and could reduce rainwater infiltration and groundwater recharge. Infiltration rates vary depending on the overlying soil types. In general, sandy soils have higher infiltration rates and can contribute to significant amounts of ground water recharge; clay soils tend to have lower percolation potentials; and impervious surfaces such as pavement significantly reduce infiltration capacity and increase surface water runoff. The amount of new pavement and the extent to which it affects infiltration depends on the site-specific soil type. Projects located in urban areas would have less of an impact than projects converting open lands and spaces.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at the program level is not feasible. However, many of the individual RTP projects are located in urban areas and along existing highways, streets, and roads in which most of the surfaces are already paved or impervious. In addition, extensive storm drainage systems present in these areas currently intercept rainfall and runoff waters, thus limiting the amount of groundwater recharge that occurs. Each project will include detailed project specific drainage plans that control storm water runoff, both during and after construction. The drainage plan will include project specific best management measures that are designed to allow for natural recharge and infiltration of stormwater. Implementation of the RTP would have a **less than significant** impact from these issues.

**Response c.i-iv):** Individual RTP projects would create new impervious surfaces. This would result in an incremental reduction in the amount of natural soil surfaces available for infiltration of rainfall and runoff, potentially generating additional runoff during storm events. In addition, the increase in impervious surfaces, along with the increase in surface water runoff, could increase the non-point source discharge of pollutants. Anticipated runoff contaminants include sediment, pesticides, oil and grease, nutrients, metals, bacteria, and trash. Contributions of these contaminants to stormwater and non-stormwater runoff would degrade the quality of receiving waters. During the dry season, vehicles and other urban activities release contaminants onto the impervious surfaces, where they can accumulate until the first storm event. During this initial storm event, or first flush, the concentrated pollutants would be transported via runoff to stormwater drainage systems. Contaminated runoff waters could flow into the stormwater drainage systems that discharge into rivers, agricultural ditches, sloughs, and channels and ultimately could degrade the water quality of any of these water bodies.

Additionally, some of the RTP projects could potentially alter surface drainage patterns as a result of directly altering flow patterns, or placing structures in a floodway, all of which could yield increased amounts of stormwater runoff and/or redirect flood flows. The construction activities associated with RTP projects, such as road widening, interchange reconstruction, and other projects that convert permeable surfaces or install permanent structures would require stormwater drainage management measures to avoid flooding impacts. The existing storm drainage network in Del Norte County may not have sufficient capacity to convey the additional

runoff from the individual RTP projects. If the storm drainage network is not appropriately designed it could be overwhelmed during a large storm event and result in flooding.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at the program level is not feasible. As previously discussed, the implementing agency would be also be required to obtain permits from the Army Corps of Engineers and the Department of Fish and Wildlife if any work is performed within a waterway. Each RTP project will also include detailed project specific floodplain and drainage studies that assess the drainage characteristics and flood risks so that an appropriate storm drainage plan can be prepared to control storm water runoff, both during and after construction. The drainage plan will ultimately include project specific best management measures that are designed to allow for natural recharge and infiltration of stormwater. Implementation of the following mitigation measures would ensure that the RTP would have a **less than significant** impact from these issues.

### **Mitigation Measures**

**Mitigation Measure 9:** *Conduct project-level drainage studies. As part of the infrastructure plan, the project implementation agencies and/or their contractors will conduct a drainage study. This study will address the following topics:*

- *A calculation of pre-development runoff conditions and post-development runoff scenarios using appropriate engineering methods. This analysis will evaluate potential changes to runoff through specific design criteria, and account for increased surface runoff.*
- *An assessment of existing drainage facilities within the project area, and an inventory of necessary upgrades, replacements, redesigns, and/or rehabilitation, including the sizing of on-site stormwater detention features and pump stations.*
- *A description of the proposed maintenance program for the onsite drainage system.*
- *Standards for drainage systems to be installed on a project/parcel-specific basis.*
- *Proposed design measures to ensure structures are not located within 100-year floodplain areas.*

*Drainage systems will be designed in accordance with the County's, Flood Control Agency's, and other applicable flood control design criteria. As a performance standard, measures to be implemented from those studies will provide for no net increase in peak stormwater discharge relative to current conditions, ensure that 100-year flooding and its potential impacts are maintained at or below current levels, and that people and structures are not exposed to additional flood risk.*

**Mitigation Measure 10:** *Avoid restriction of flood flows. Proposed projects requiring federal approval or funding will comply with Executive Order 11988 for floodplain management. Projects will avoid incompatible floodplain development designs, they will restore and preserve the natural and beneficial floodplain values, and they will maintain consistency with the standards and criteria of the National Flood Insurance Program. In addition, a Letter of Map Revision (LOMR) will be prepared and submitted to FEMA where unavoidable construction would occur within 100-year floodplains. The LOMR will include revised local base flood elevations for projects constructed within flood prone areas. Potential impacts due to flooding as a result of RTP projects are assumed to be alleviated through the FEMA LOMR approval process.*

**Mitigation Measure 11:** *Avoid project dewatering. Project designs that require continual de-watering activities for the life of the projects will be avoided if possible. Due to the potential for flooding and destabilizing conditions, project implementation agencies will choose project designs that do not require continual dewatering, if suitable project alternatives exist. Project alternatives may include construction of overpasses, as opposed to below-grade underpasses, which would avoid interception with groundwater.*

**Response d):** Coastal areas in Del Norte County are especially susceptible to tsunamis. Past tsunamis include the 1964 tsunami which destroyed a large portion of the Crescent City Harbor and Crescent City itself. More recently, the 2011 tsunami caused extensive damage to the Crescent City Harbor. Evacuation assembly points and evacuation routes for Del Norte County are detailed in Table 2.8 in the Regional Transportation Plan. Notable routes include US 101, Elk Valley Road, 9<sup>th</sup> Street, A Street, C Street, and H Street in Crescent City; First Street and Pala Road in Smith River; Kellogg Road, Morehead Road, Moseley Road, and Lower Lake Drive in Fort Dick. Klamath does not have any evacuation routes.

Residents are advised to seek refuge 100 feet above sea level or two miles inland. Additionally, residents are advised to prepare for evacuation by knowing evacuation routes and assembly points and traveling to them via foot. Evacuation maps for the tsunami hazard zones can be viewed at: <http://preparedelnorte.com/tsunami-zones/index.html>.

Any RTP projects constructed within areas subject to flooding, including areas prone to tsunamis, would be built following standard building codes and federal, state, and local regulations; all of which would be adequate to protect against further personal injury or death. This would result in a significant impact. Implementation of the following mitigation measure would reduce this impact to a ***less than significant*** level.

### ***Mitigation Measures***

***Mitigation Measure 12:*** Design projects to ensure that no tsunami evacuation routes are obstructed, including during any construction process. An obstruction would occur if foot and/or vehicle traffic were impeded from traveling to a refuge site.

## XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?			X	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

### Responses to Checklist Questions

**Response a):** The majority of RTP projects would involve transportation system improvements to existing facilities, which would mostly occur within or in close proximity to existing rights-of-way. Some RTP projects will involve new facilities that will occur within or adjacent to existing communities. In many cases, improvements to facilities will occur where communities are already physically divided by existing facilities, including highways, roadways, and intersections. The RTP is intended to improve inter- and intra-regional connectivity and new or improved land use linkages. However, specific projects have the potential to divide existing contiguous land uses. Because these potential improvement projects could occur within the developed areas, communities could be affected.

Because the proposed project is a planning document and thus, no physical changes will occur to the environment, adoption of the proposed project would not directly impact the environment. It is assumed that RTP projects that affect roads and interchanges present the greatest potential for impacts regarding the division of an established community. All RTP projects will be designed to maintain the cohesiveness of the existing communities to the greatest extent feasible. Where full design mitigation is not feasible, modifications would be incorporated into the design to minimize the impacts associated with project implementation. Adherence to the requirements of local policies and standard measures would reduce this impact to a *less than significant* level.

**Response b):** This RTP is consistent with the County's General Plan Circulation Element, which supports the development and maintenance of an efficient, safe, and effective road system. The Circulation Element also supports an integrated multi-modal system consistent with demand and available resources, as well as the study of orderly growth of both the Del Norte County Airport and the Crescent City Harbor. The goals of the General Plan circulation element are consistent with the goals outlined in the Policy Element.

This RTP recognizes the importance of integrating land use planning and transportation planning to create a more efficient system. Future development should occur in areas which will be the easiest to develop without high public service costs, have the least negative environmental impact, and which will not displace or endanger the region's critical natural resources. This approach will result in lower cost for improvements and increased operational efficiency of the existing transportation system because it will be sized to reflect more compact growth near existing or planned services. Compact growth leads to healthier lifestyles, as access to bicycle and pedestrian facilities grow congruently. Additionally, aligning bicycle and pedestrian facilities with growth can help implement complete streets which increase livability and reduce traffic demand within the region by encouraging alternative modes. The complete street concept is supported and encouraged in this RTP and the California Transportation Plan 2040.

The RTP, being that it is a broad planning process covering the entire County, involves many government agencies that maintain a variety of plans and policies, some of which are aimed at avoiding or mitigating an environmental effect. During development of the 2020 RTP update, existing plans, policy documents and studies addressing transportation in Del Norte County were reviewed. These documents are listed below:

#### Del Norte Regional Transportation Plan 2020

- Del Norte General Plan Circulation Element (2003)
- Crescent City General Plan (2001)
- Del Norte County Short-Range Transit Plan (2014)
- Redwood Coast Transit Authority Short Range Transit Plan (2019)
- Coordinated Public Transit – Human Service Transportation Plan (2015)
- Final Public Participation Plan (2013)
- Wild Rivers Regional Blueprint Plan (2009)
- Annual Unmet Transit Needs
- Active Transportation Plan (2017)
- Ten-Year State Highway Operation and Protection Plan (2008/09 through 2017/18)
- STIP Fund Estimate, Caltrans (2020)
- California Transportation Plan 2040
- California Strategic Highway Safety Plan (SHSP) (2020)
- Climate Adaptation and Stormwater Management Plan (2015)
- Transportation Emergency Preparedness Initiative (2013)
- Del Norte Region SB 743 Implementation Plan (2020)

Although the Del Norte region was impacted by both the global COVID pandemic and seasonal wildfires during the development of the 2020 RTP update, a creative and inclusive public participation campaign was executed to inform the public about the RTP and include the public in the planning process. The community was notified about the RTP and invited to community workshops through a project website, a social media campaign including Facebook and Twitter, and newspaper ads. To accommodate social distancing recommendations, community meetings were held on the digital platform Zoom. In addition, community members were notified of the option to provide feedback online through various channels, including the project website, the Del Norte Local Transportation Commission website, via a questionnaire promoted through various social media channels, and directly to the project team via email or phone.

**Coordination with the California State Wildlife Action Plan:** Projects identified in the 2020 Regional Transportation Plan are evaluated at the project level through the CEQA and NEPA (if applicable) process. However, the long-term goals identified in the Policy Element of this plan consider many of the stressors defined in the State Wildlife Action Plan.

Del Norte County straddles two separate conservation management ecoregions within the North Coast and Klamath Province, as identified by the California State Wildlife Action Plan (SWAP): “Northern Coastal and Montane Riparian Forests and Woodlands” and “Pacific Northwest Conifer Forests”. The SWAP identifies sensitive species, habitat stressors and suggested conservation goals and actions for each of the ecoregions within the Provinces. According to the SWAP, the major stressors within Del Norte County conservation units are as follows:

- Agricultural and Forestry Effluents

- Annual and Perennial Non-timber Crops
- Climate Change
- Fire and Fire Suppression
- Household Sewage/ Urban Wastewater
- Introduced Genetic Material
- Parasites/Pathogens/Diseases
- Roads and Railroads
- Wood and Pulp Plantations
- Logging and Wood Harvesting
- Livestock, Farming and Ranching
- Invasive Plants/Species

For a complete list of species of special concern, key stressors and actions suggested for wildlife management in the North Coast and Klamath region, see Attachment C of the RTP.

The RTP transportation improvements respond to growth, safety, maintenance, mobility, and connectivity issues for the transportation system throughout the region. The RTP transportation improvements are multi-modal, meaning they cover vehicular, pedestrian, bicycle, transit, air travel, etc. Each individual RTP project will be evaluated on a project-specific level during the design and engineering stage of the process. This will include a review for conformance with the applicable General Plan. The RTP itself would not result in significant conflicts with plans, policies, and regulations adopted to mitigate an environmental effect. Implementation of the proposed project would have a *less than significant* impact relative to this issue, therefore no mitigation is required.

*XII. MINERAL RESOURCES*

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	

*Responses to Checklist Questions*

**Response a-b):** Mineral resources are found in Del Norte County. Most of the gold produced in Del Norte County has come from placer-mining operations along the Smith River and its tributaries. These operations include the placer mines of Hurdy Gurdy, Monkey, Myrtie, and Craigs Creeks and the French Hill area. Gold has been obtained by mining the present stream gravels, terrace gravels adjacent to the present streams, and patches of the so-called Klamath "oldland cycle" gravels at such places as French Hill and Haines Flat. The terrace and "oldland" gravels were mined by hydraulicking. The principal period of mining was from the 1850s through the 1870s, but there has been small-scale intermittent work ever since. The estimated total production is 40,000 ounces of gold. Chrome ore also was mined at French Hill during World Wars I and II.

There are presently hundreds of mining claims held in the county, but there is very little mining activity with the exception of recreational panning and dredging. Mining claims exist for gold, cobalt, nickel, and chromium. Nickel laterites in the northwestern portion of the county constitute the worlds largest land-based resource of nickel. Aggregate mining currently makes up the majority of mining activities in the County, with most mines located along the Smith River, Klamath River, and its tributaries.

Some individual RTP improvements may be located in the vicinity of land that that contains mineral resources. Implementation of the improvements would not directly cause changes resulting in conversion of any mining operations into a different use. Additionally, the individual improvement projects will improve transportation systems in the County, which would provide a beneficial impact for mining operations. Implementation of the proposed project will have a *less than significant* impact on mineral resources; therefore, no mitigation is required.



**XIII. NOISE**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

**Responses to Checklist Questions****Response a):**

**General Construction Activities:** The proposed RTP does not directly cause a noise impact, although it could indirectly have noise impacts as a result of development and operation of subsequent RTP projects during both the short and long-term lifespan of the RTP. A majority of the proposed improvements identified in the RTP, with the exception of changes in transit operations, transportation demand management, and regional planning, would require some level of construction. Larger construction-related projects, such as interchange improvements, bridge improvements, and road realignment and widening projects, would be of particular concern given the noise and ground-borne vibration generation potential of these projects.

Noise levels typically associated with roadway construction equipment and distances to predicted noise contours are summarized in Table NOISE-1.

**Table NOISE-1: Construction Equipment Noise Levels**

EQUIPMENT	TYPICAL NOISE LEVEL (dBA) 50 FEET FROM SOURCE		DISTANCE TO NOISE CONTOURS (FEET, dBA L <sub>EQ</sub> )		
	L <sub>MAX</sub>	L <sub>EQ</sub>	70 dBA	65 dBA	60 dBA
Air Compressor	80	76	105	187	334
Auger/Rock Drill	85	78	133	236	420
Backhoe/Front End Loader	80	76	105	187	334
Blasting	94	74	83	149	265
Boring Hydraulic Jack/Power Unit	80	77	118	210	374
Compactor (Ground)	80	73	74	133	236
Concrete Batch Plant	83	75	94	167	297
Concrete Mixer Truck	85	81	187	334	594
Concrete Mixer (Vibratory)	80	73	74	133	236
Concrete Pump Truck	82	75	94	167	297
Concrete Saw	90	83	236	420	748
Crane	85	77	118	210	374
Dozer/Grader/Excavator/Scraper	85	81	187	334	594

EQUIPMENT	TYPICAL NOISE LEVEL (dBA)		DISTANCE TO NOISE CONTOURS		
	50 FEET FROM SOURCE		(FEET, dBA L <sub>EQ</sub> )		
Drill Rig Truck	84	77	118	210	374
Generator	82	79	149	265	472
Gradall	85	81	187	334	594
Hydraulic Break Ram	90	80	167	297	529
Jack Hammer	85	78	133	236	420
Impact Hammer/Hoe Ram (Mounted)	90	83	236	420	748
Pavement Scarifier/Roller	85	78	133	236	420
Paver	85	82	210	374	667
Pile Driver (Impact/Vibratory)	95	88	420	748	1,330
Pneumatic Tools	85	82	210	374	667
Pumps	77	74	83	149	265
Truck (Dump/Flat Bed)	84	80	167	297	529

SOURCES: FHWA 2006

As indicated, maximum intermittent noise levels associated with construction equipment typically range from approximately 77 to 95 dBA L<sub>max</sub> at 50 feet. Pile driving and demolition activities involving the use of pavement breakers and jackhammers, and are among the noisiest of activities associated with transportation improvement and construction projects. Depending on equipment usage and duration, average-hourly noise levels at this same distance typically range from approximately 73 to 88 dBA L<sub>eq</sub>. Distances to predicted noise contours would, likewise, vary depending on the specific activities conducted and equipment usage. Delivery vehicles, construction employee vehicle trips, and haul truck trips may also contribute to overall construction noise levels.

Increases in ambient noise levels associated with construction projects located near sensitive land uses can result in increased levels of annoyance, as well as potential violation of local noise standards. Construction activities occurring during the more noise-sensitive nighttime hours would be of particular concern, given the potential for increased sleep disruption. Impacts to sensitive receptors resulting from proposed transportation improvement and construction projects would depend on several factors, such as the equipment used, surrounding land uses, shielding provided by intervening structures and terrain, and duration of construction activities.

The following mitigation measure would limit construction to the daytime hours, to the extent feasible, and would require equipment to be properly maintained and muffled. Furthermore, this mitigation measure provides resident notification requirements, and measures to resolve noise complaints. Implementation of Mitigation Measure NOISE-1 would reduce this impact to a **less than significant** level.

**Operational Traffic:** The 2020 RTP does not directly cause a noise impact, although it could indirectly have noise impacts as a result of development and operation of subsequent RTP projects during both the short and long-term. While many of these projects will likely have no effect on the operational noise generation of the facility, some improvement projects, which involve new facilities or capacity enhancements for existing facilities, could affect noise-sensitive land uses. Noise-sensitive land uses could be exposed to noise in excess of normally acceptable noise levels or increases in noise as a result of the operation of expanded or new transportation facilities (i.e., increased traffic resulting from roadway capacity improvements, new transit facilities, etc.).

Del Norte County and the City of Crescent City have adopted Noise Elements of their General Plans that establish noise-related policies that, when implemented, protect sensitive receptors from significant noise. The policies that are laid out in the Noise Element(s) are consistent with federal and state regulations designed to protect noise sensitive receptors. During the design process, the implementing agency would be responsible for ensuring that the project is designed consistent with adopted policies and state and federal regulations. Although the policy and regulatory controls for noise-related impacts are in place in the planning area, subsequent improvement projects would result in an increase in traffic noise levels. For most projects, consistency with the adopted policies and established regulations would help to reduce exposure of sensitive receptors to transportation noise levels. In addition, the following mitigation measure would require a project-level noise evaluation for each RTP project that is located near a sensitive receptor. The noise evaluation would identify areas that would have elevated noise levels as a result of the project and require measures to attenuate the noise to an acceptable level. Such measures could include constructing earth berms, sound walls, establishing buffers, or improving acoustical insulation in residential units. Implementation of this mitigation measure would reduce this impact to a ***less than significant*** level.

### **Mitigation Measure**

**Mitigation Measure 13:** *Prior to approval of new construction projects adjacent to noise-sensitive uses, the implementing agency shall perform a project-level noise evaluation. The implementing agencies shall consider the following measures:*

- *Construct vegetative earth berms with mature trees and landscaping to attenuate roadway noise on adjacent residences or other sensitive use, and /or sound walls or other similar sound-attenuating buffers, as appropriate.*
- *Design projects to maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, transit centers, park-and-ride lots, and other new noise generating facilities.*
- *Establish speed limits ~~and limits on hours of operation~~ of transit systems.*

**Response b):** Ground-borne vibration and noise levels associated with highway traffic is typically considered to pose no threat to buildings and potential public disruption would be minimal. Traffic vibration levels are typically highest associated with truck passbys. Automobile traffic normally generates vibration peaks of one-fifth to one-tenth of that of trucks. Based on measurements conducted by Caltrans, even the highest truck generated vibrations, which were measured at approximately 16 feet from the centerline of the near travel-lane, were not found to exceed 0.08 in/sec. This level coincides with the maximum recommended “safe level” for ruins and historical structures.

Construction activities would, however, require the use of off-road equipment which could adversely affect nearby land uses. The highest ground-borne vibration levels would be generated by the use of pile drivers and vibratory rollers. Ground-borne vibration levels associated with proposed construction improvement projects could potentially exceed recommended criteria for structural damage and/or human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby existing land uses. As a result, exposure to construction-generated ground-borne vibration levels would be considered ***potentially significant***.

Mitigation Measure NOISE-2 would limit construction to the daytime hours, to the extent feasible, and would require use of equipment with reduced equipment noise/vibration levels, to the extent practical. The level of mitigation would be project and site specific and would include measures normally required by Caltrans, as well as requirements under General Plan Noise

Elements and Noise Ordinances of the applicable jurisdictions. Implementation of the following mitigation measure would reduce this impact to a ***less than significant*** level.

### ***Mitigation Measure***

***Mitigation Measure 14:*** *Subsequent projects under the RTP shall be designed and implemented to reduce adverse construction noise and vibration impacts to sensitive receptors, as feasible. Measures to reduce noise and vibration effects may include, but are not limited to:*

- *Limit noise-generating construction activities, excluding those that would result in a safety concern to workers or the public, to the least noise-sensitive daytime hours, which is generally 6am to 9pm.*
- *Construction of temporary sound barriers to shield noise-sensitive land uses.*
- *Location of noise-generating stationary equipment (e.g., power generators, compressors, etc.) at the furthest practical distance from nearby noise-sensitive land uses.*
- *Phase demolition, earth-moving and ground-impacting operations so as not to occur in the same time period.*
- *Use of equipment noise-reduction devices (e.g., mufflers, intake silencers, and engine shrouds) in accordance with manufacturers' recommendations.*
- *Substituting noise/vibration-generating equipment with equipment or procedures that would generate lower levels of noise/vibration. For instance, in comparison to impact piles, drilled piles or the use of a sonic or vibratory pile driver are preferred alternatives where geological conditions would permit their use.*
- *Other specific measures as they are deemed appropriate by the implementing agency to maintain consistency with adopted policies and regulations regarding noise.*
- *Comply with all local noise control and noise rules, regulations, and ordinances.*

**Response c):** Some of the RTP projects are located within close proximity to airports within the County, and some are improvements to existing airports. These improvements are transportation related and do not create residences, or other habitable structures within proximity to the airport, and they do not conflict with the airport land use plans within Del Norte County. The proposed project would not expose people residing or working in the project area to excessive noise levels. This is a ***less than significant*** impact.

#### XIV. POPULATION AND HOUSING

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

##### *Responses to Checklist Questions*

**Response a):** Given the historical and current population, housing, and employment trends, growth in the region is inevitable; however, the rate of growth is considered low compared to the larger metropolitan areas of the Central Valley and Southern California. Two principle factors that account for population growth are natural increase and net migration. The average annual birth rate for California is expected to be 20 births per 1,000 people compared to 10 births per 1,000 people in West Virginia, the state with the lowest projected birth rate. Additionally, California is expected to attract more than one third of the Country's immigrants. Other factors that affect growth include the cost of housing, the location of jobs, the economy, the climate, and transportation.

The RTP has been planned to accommodate anticipated levels of growth, including growth associated with the adopted general plan. The RTP does not involve approvals associated with any development projects and does not provide infrastructure that could facilitate additional development in the region. The RTP does not induce growth beyond the growth that is planned or being planned by regional and local jurisdictions.

The PCTC does not make land use approvals associated with this growth, nor do they have the authority to make local land use decisions. Implementation of the RTP will have a ***less than significant*** impact on this issue, therefore no mitigation is required.

**Responses b-c):** The RTP would not, in and of itself, displace substantial numbers of housing units or people. The majority of RTP projects involve work within or adjacent to existing rights-of-way and would not involve acquisition of land and displacement of substantial numbers of persons or housing. This is true of most highway and street widening projects, and modifications to intersections/interchanges. These transportation projects will generally not require the displacement of any residences or businesses since the right-of-way has already been acquired.

Some of the RTP projects may involve land acquisition. While most of the additional right-of-way acquisition is anticipated to be vacant or undeveloped land, at a few isolated locations the land necessary for the improvement may include existing residential units or businesses. This is anticipated to be rare and involve a limited number of residences or businesses.

State and federal law require due compensation for property taken to carry out the infrastructure projects. Also required by law, relocation and assistance must be provided to displaced residents and businesses in accordance with the Federal Uniform Relocation and Real Property Acquisition Policies Act of 1970 and the State of California Relocation Assistance Act.

As noted above, RTP projects would not result in displacement or relocation of a substantial number of homes, businesses, or people. Growth planned in the general plans would result in additional housing opportunities and would more than offset any units removed in association with RTP projects. Therefore, impacts related to a substantial displacement of housing units or persons as a result of the RTP are ***less than significant***, and no mitigation is required.

**XV. PUBLIC SERVICES**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

*Responses to Checklist Questions*

**Responses a), b), c), d), e):** The improvements identified in the RTP include a variety of transportation improvements that will not result in an increased need for any public services or facilities. The proposed project would not result in an increased demand, or require the need for expansion of the existing recreational facilities beyond what is planned in the General Plan. Implementation of the proposed project will have a ***less than significant impact*** on public services, and no mitigation is required.

*XVI. RECREATION*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

*Responses to Checklist Questions*

**Responses a-b):** The improvements identified in the RTP include a variety of transportation improvements that will not result in an increased demand, or require the need for expansion of the existing recreational facilities. Furthermore, the improved roadway infrastructure will not require a need for new recreational facilities. Implementation of the proposed project will have a *less than significant impact* on recreational facilities, and no mitigation is required.



## XVII. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

### Responses to Checklist Questions

**Responses a-b):** Implementation of the RTP would support a number of transportation projects throughout the County, including roadway, transit, bicycle, and pedestrian. Some of the projects involve transportation operations, while others involve safety enhancements or maintenance. The long-term operation of these facilities is anticipated to have beneficial impacts and are considered to be consistent with local plans, policies, and ordinances.

Implementation of the proposed project would not result in population growth within Del Norte County and would not directly result in decreases in LOS or increases in VMT on area roadways. It is noted that VMT is anticipated to increase over the planning horizon as a result in trips/trip lengths that originate outside Del Norte County and travel to, or through, the planning area; however, this VMT is not attributed to the residents of Del Norte County, or the RTP policies, financing programs, or actions. The proposed project would improve traffic flows and operations throughout the county, emphasizing safety concerns, and would not result in a conflict with transportation plans, policies, or ordinances. Implementation of the proposed project would have a **less than significant** impact relative to this issue, and no mitigation is required.

**Responses b):** Reducing vehicle miles traveled has become one of the top priorities for Local and State agencies involved in transportation, in alignment with State and Federal legislation setting goals for greenhouse gas reductions. Vehicle miles of travel (VMT) is a general but robust measure of vehicle activity. It measures the extent of utilization a transportation network experiences by motorists. Although it is not a good indicator of congestion, it is a great indicator of overall vehicle activity, identifying bottlenecks or high delay “hotspot” locations. VMT is commonly applied on a per-household or per-capita basis and is a primary input for regional air quality analyses and for developing VMT rates for safety analysis. Per Senate Bill 743 (Steinberg, 2013), VMT is now the basis for transportation impact identification and mitigation under the California Environmental Quality Act (CEQA). However, jurisdictions must also ensure consistency with current land use plans, some of which still utilize Level of Service as a primary metric.

VMT data is annually reported as part of the Federal Highway Performance Monitoring System (HPMS) program. The HPMS program uses a sample-based method that combines traffic counts

stratified by functional classification of roadways by volume groups to produce sample based geographic estimates of VMT. HPMS VMT estimates are considered “ground truth” by the 1990 Federal Clean Air Act Amendments (November 15, 1990). HPMS VMT estimates are used to validate baseline travel demand models and to track modeled VMT forecasts over time. HPMS VMT estimates are reported for each county by local jurisdiction, state highway use, and other state/federal land roadways e.g., State Parks, US Bureau of Land Management, US Forest Service, US Fish and Wildlife Service.

Estimates of countywide VMT for Del Norte County for the four most recent years available (2015-2018) are provided in Table Traffic-1. As shown, VMT has consistently increased over all county roadways during this four-year period. See Table Traffic-2 for projected VMT on Del Norte County roadways.

**Table Traffic-1 Existing Vehicle Miles Traveled**

JURISDICTION	2015 DAILY VMT	2016 DAILY VMT	2017 DAILY VMT	2018 DAILY VMT	CHANGE, 2015-2018	AVERAGE ANNUAL CHANGE, 2015-2018
Crescent City	22.8	22.9	28.5	28.6	20.2%	6.7%
Bureau of Indian Affairs	5.0	5.0	5.3	5.3	4.3%	1.4%
Del Norte County	184.4	208.8	198.1	198.8	7.3%	2.4%
National Park Service	4.9	4.9	5.2	5.1	4.0%	1.3%
State Highways	439.3	492.2	492.2	533.7	17.7%	5.9%
State Park Service	29.3	29.3	30.6	30.3	3.2%	1.1%
U.S. Forest Service	65.5	65.0	69.1	75.2	12.8%	4.3%
<b>Total</b>	<b>751.2</b>	<b>828.1</b>	<b>829.1</b>	<b>876.8</b>	<b>14.3%</b>	<b>4.8%</b>

SOURCE: 2010 - 2018 CALIFORNIA PUBLIC ROAD DATA

**Table Traffic-2 Projected Vehicle Miles Traveled**

JURISDICTION	2020 DAILY VMT	2025 DAILY VMT	2030 DAILY VMT	2035 DAILY VMT	2040 DAILY VMT
Crescent City	28.9	29.6	30.3	31.1	31.9
Bureau of Indian Affairs	5.3	5.3	5.3	5.4	5.4
Del Norte County	199.6	201.6	203.6	205.7	207.7
National Park Service	5.1	5.1	5.1	5.2	5.2
State Highways	539.0	552.6	566.6	580.9	595.6
State Park Service	30.3	30.5	30.6	30.8	30.9
U.S. Forest Service	75.8	77.3	78.9	80.4	82.1
<b>Total</b>	<b>885.6</b>	<b>908.0</b>	<b>930.9</b>	<b>954.4</b>	<b>978.5</b>

SOURCE: DEL NORTE LOCAL TRANSPORTATION COMMISSION (2020)

~~It is expected that VMT will increase minimally on Del Norte County roadways over the lifetime of the proposed project due to little or no population growth projected over the coming decades. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day. The population decrease does not result in a VMT decrease, however, instead it is expected that VMT will increase on Del Norte County roadways over the lifetime of the proposed project. VMT in Del Norte County will increase at an~~

estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.

The prima facie assumption would be that per capita VMT increases by 13% per capita; however, it is critical to look deeper into the source of the VMT calculations to understand the source of the trips and trip lengths. The VMT calculations include vehicle miles traveled on state highways that travel through Del Norte County, including those that did not originate in Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. It is fully appropriate for the VMT analysis in the RTP to account for these trips and trip lengths even though they do not originate and are not attributable to the residents of Del Norte County. What this VMT analysis illustrates is that the desire for non-residents to travel to, or through, Del Norte County is anticipated to grow over the planning horizon, and as a result the total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.

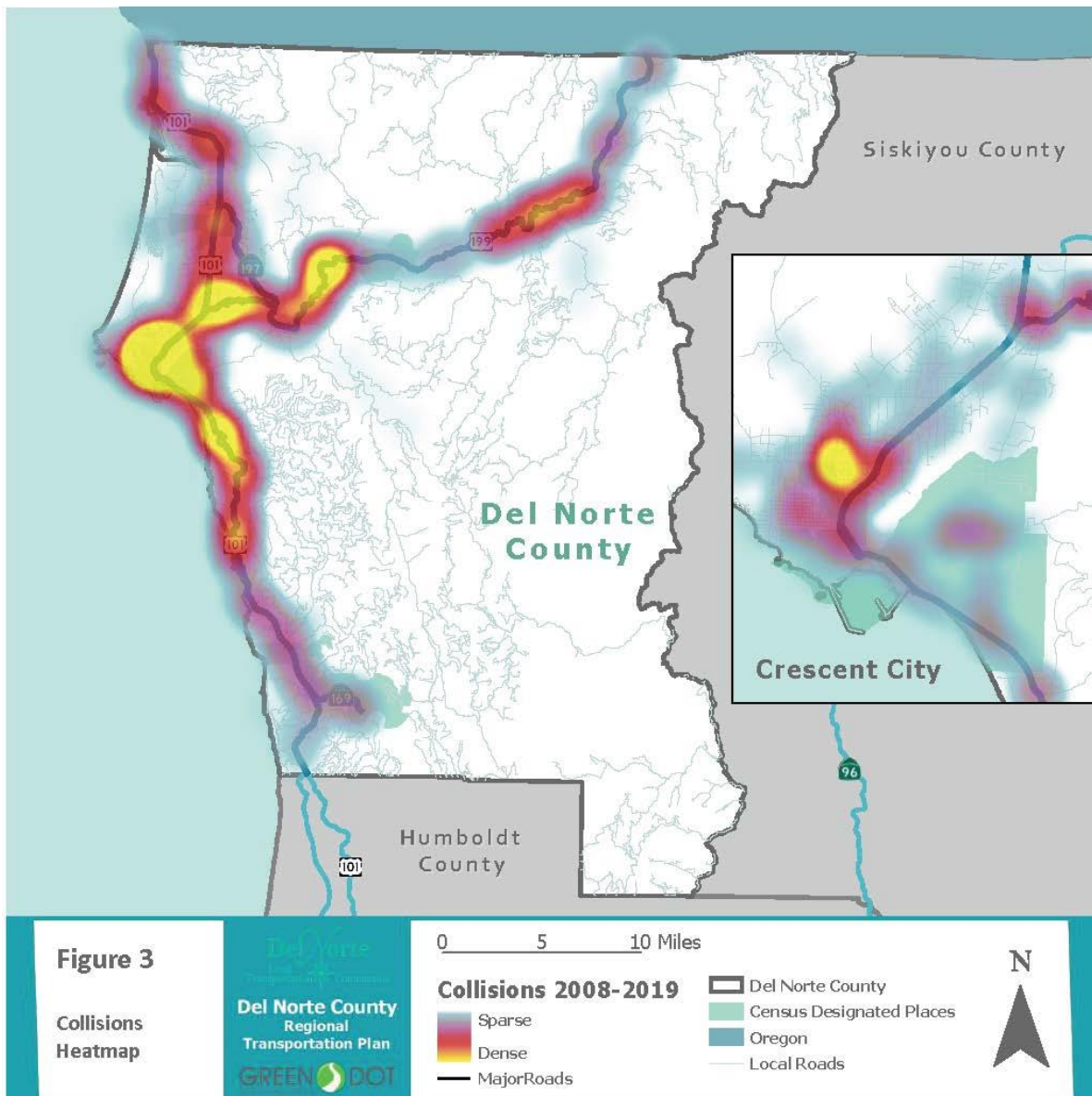
Section 15064.3 of the CEQA Guidelines states that “*Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact...*” Given that VMT increases over the next 20 years are projected to be very slight+0.52% annually, the source of the annual increase is non-residents that are traveling to, or through Del Norte County, the VMT from residents is anticipated to decrease with the overall population decrease, and the individual improvements programed under the RTP are not anticipated to ~~have an impact on~~ drive VMT increases given they are prioritized to be safety improvements, implementation of the proposed project would have a ***less than significant*** impact relative to topic, therefore no mitigation is required.

**Responses c):** The RTP prioritizes safety improvements, and includes roadway projects designed to ~~alleviate existing and anticipated future congestion issues and to~~ reduce traffic hazards. Figure 3 and 4 illustrate traffic collisions, which represent hazards that warrant improvements. The RTP includes long range planning and financing efforts to improve conditions such that the risk of collisions is reduced.

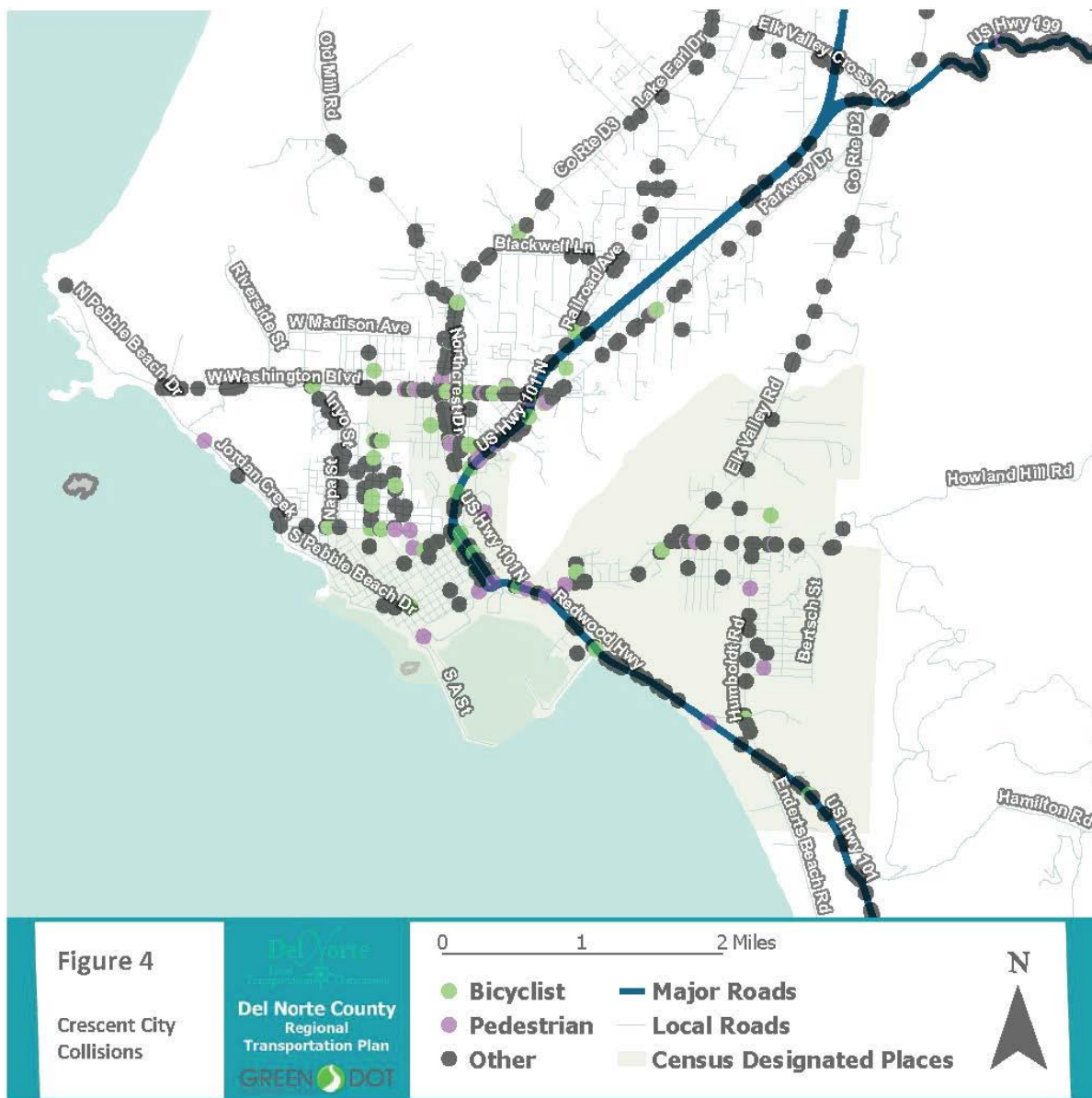
While the RTP includes numerous projects that will involve a design/engineering process, the project-specific designs and plans for these improvements are not available for analysis at this time. However, consistent with agency practice, all improvements will be designed to the standards and specifications of Caltrans or the appropriate implementing agency. As such, the proposed project is not anticipated to cause a substantial increase in hazards due to design features or incompatible uses. Therefore, the potential impacts on safety and compatibility are considered ***less than significant***, and no mitigation is required.

**Responses d):** The RTP does not propose any specific projects that are believed to result in inadequate emergency access. In some cases, the RTP would provide increased regional connectivity and should improve movement of emergency vehicles. However, emergency access could potentially be affected during construction activities associated with implementation of the various improvement projects identified in the RTP. The county would prepare a traffic control plan for construction and coordinate with emergency service providers to ensure that emergency routes are identified and remain available during construction activities. It will be

especially important that each individual roadway construction project be considered relative to the fire season and that it be designed to ensure that there is adequate roadway capacity for emergency evacuation in the event of a wildfire during the construction effort. Implementation of proposed project is a long-range planning document that will have a ***less-than-significant*** impact, and no mitigation is required.



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**XVIII. TRIBAL CULTURAL RESOURCES**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.		X		

**Responses to Checklist Questions**

**Responses ai-ii):** In adherence with Assembly Bill 52 (AB 52), local Tribal entities were contacted pursuant to Public Resource Code § 21080.3.1 (hereafter PRC) regarding the development of the RTP. PRC requires that lead agencies of projects consult with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe has requested notice from agencies of proposed projects in the geographic area.

There are four federally recognized Tribal entities in Del Norte County. Cooperative planning between Tribes, regional and local agencies and Caltrans varies from Tribe to Tribe. Some of the region's Tribes are regular participants in regional planning efforts, including the Yurok Tribe who has a regular position on the Technical Advisory Committee. All Tribal entities were contacted to discuss transportation deficiencies, system improvements ideas, and Tribal project lists for inclusion. Table Tribal-1 lists the contact information for the Tribes. For a full record of Native American Tribal coordination and consultation efforts, see Attachment D of the RTP.

**Table Tribal-1: Native American Tribal Contacts**

TRIBAL ENTITY	CONTACT	ADDRESS
Yurok Tribe	Joseph James, Chairman jjames@yuroktribe.nsn.us	190 Klamath Blvd. Klamath, CA 95548
Elk Valley Rancheria	Dale Miller, Chairman dmiller@elk-valley.com	2332 Howland Hill Rd. Crescent City, CA 95531
Tolowa Dee-ni' Nation	Denise Richards-Padgette, Chairperson dpadgette@towola.com	140 Rowdy Creek Rd. Smith River, CA 95567
Resighini Rancheria	Fawn Murphy, Chairperson resighini@gmail.com	158 East Klamath Bech Rd. Klamath, CA 95548

SOURCES: DEL NORTE LOCAL TRANSPORTATION COMMISSION (2020)

Implementation of most of the RTP improvements would be constructed within the existing rights-of-way. Improvements and modifications within existing rights-of-way would have less potential to encounter previously unknown tribal resources relative to projects in undisturbed areas since the former right-of-way areas have already been disturbed. Improvements and modifications within existing rights-of-way still have potential to adversely affect tribal resources, either directly or indirectly.

Based upon the general planning nature of the RTP, development of detailed, site-specific information on this impact at this planning level is not feasible. As RTP projects are designed and reviewed by local jurisdictions, the RTP projects will undergo technical analysis to evaluate any potential impacts to tribal resources within their area of potential effect. This will include consultation with the Native American Heritage Commission to determine whether known sacred sites are in the project area. If recommended, a qualified archaeologist will be consulted to conduct archaeological surveys. In some cases, tribal leaders may also conduct surveys of a site. The significance of any resources that are determined to be in the project area will be assessed according to the applicable local, state, and federal significance criteria.

Implementation of several mitigation measures presented under the cultural resources section of this Initial Study would ensure that all subsequent RTP projects either avoid known tribal resources, or take steps to implement amelioration methods to reduce impacts to known resources. It would also require investigations and avoidance methods in the event that a previously undiscovered resource is encountered during construction activities. This mitigation measure would reduce this impact to a *less than significant* level, therefore no mitigation is required.

*XIX. UTILITIES AND SERVICE SYSTEMS*

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

*Responses to Checklist Questions*

**Responses a-b), d-g):** The county has an elaborate network of public utilities and services, such as water, wastewater, and solid waste collection and disposal. It has been a goal of the county to maintain an adequate level of services for all public utilities and services provided to the community. Utility infrastructure exists in various parts of the county. The proposed project does not require the use of these utilities or infrastructure and would not result in the expansion of utilities or infrastructure. Implementation of the proposed project will have a **less than significant** impact, and no mitigation is required.

**Response c):** Some individual improvement project may result in additional impervious services and increased stormwater runoff from pavement; however, most improvements do not result in more pavement/impervious surfaces. Local policies and federal and state laws provide various requirements relative to storm drainage management. These include the preparation of a drainage study for each individual improvement that would result in new impervious surfaces. The results of the drainage study would then allow for proper engineering and construction of storm drainage infrastructure (i.e. culverts, pipes, detention/retention ponds, biofilters, etc.) to control runoff and prevent flooding, erosion, and sedimentation. Each improvement that involves ground disturbance would require a Storm Water Pollution Prevention Plan that would be submitted to the Regional Water Quality Control Board for review and approval prior to issuance of a General Permit for storm water discharge. The RTP does not provide detailed engineering and drainage plans for any of the potential improvements because they will be completed at a project specific level at a later date once they

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are funded and up for approval. The RTP would have a ***less than significant*** impact on storm drainage, therefore no mitigation is required.

**XX. WILDFIRE**

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
d) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

**RESPONSES TO CHECKLIST QUESTIONS**

**Responses a), b), c), d):** The proposed project is a regional planning effort developed by the Del Norte Local Transportation Commission that covers all of Del Norte County. The planning area includes “Very High” Fire Hazard Severity Zones within the State Responsibility Area (SRA), as determined by CAL FIRE. The individual improvements projects would not result in new structures in these areas, but would improve connectivity within the planning area, thereby allowing improved management of wildfires within the planning area. Therefore, the proposed project would not impair an adopted emergency response plan or emergency evacuation plan, exacerbate wildfire risks, or expose people or structures to significant wildfire risks.

Nevertheless, there exists the possibility that proposed project could require the installation or maintenance of infrastructure associated with the proposed project that could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, the potential for individual projects to exacerbate fire risk or result in temporary or ongoing environmental impacts due to the installation or maintenance of associated infrastructure will need to be analyzed on a project-by-project level.

Project site specific design is not currently available for RTP improvement projects; therefore, the location of associated infrastructure is yet to be determined. Therefore, installation or maintenance of associated infrastructure would be evaluated on a project-by-project basis as part of the CEQA process prior to project approval. Since site specific design details are not currently available, each agency will need to do a project specific review by the implementing agency prior to project approval. Implementation of a project-level review would reduce this potentially significant impact to a *less than significant* level.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

*Responses to Checklist Questions*

**Responses a-c):** As described throughout the analysis above, the proposed project will not result in any changes to General Plan land use designations or zoning districts, would not result in annexation of land, and would not allow development in areas that are not already planned for development in the General Plan and Zoning Ordinance. With the implementation of Mitigation Measures 1-4, the project would not threaten a significant biological resource, nor would it eliminate important examples California history or prehistory. With the implementation of Mitigation Measure 5-13, the project would not cause hydrology and water quality impacts, which would ensure that fish and other aquatic wildlife are not threatened. The proposed project does not have impacts that are cumulatively considerable. With the implementation of Mitigation Measures 14-15, the project would not have substantial adverse noise impacts on human beings. There are no other environmental topics with the potential to have an adverse environmental impact. With the implementation of the mitigation measures presented above; the proposed project would have a **less than significant** impact on these environmental topics.

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Appendix A  
Response to Comments



## 1 INTRODUCTION

The Del Norte Local Transportation Commission (DNLTC) is the designated Regional Transportation Planning Agency (RTPA) for Del Norte County. The DNLTC is comprised of six commissioners, three each appointed by the Crescent City Council and the Del Norte County Board of Supervisors. Del Norte County is located within the jurisdictional boundaries of Caltrans District 1, located in Eureka. The DNLTC, along with Caltrans District 1, fulfills the transportation planning responsibilities for Del Norte County. One of the main responsibilities of the DNLTC is the preparation and approval of the Regional Transportation Plan.

DNLTC received one (1) comment letters on the Initial Study/Mitigated Negative Declaration during the 30-day public review period. Acting as lead agency, the DNLTC prepared a response to the IS/MND comments. Responses to comments received during the comment period did not involve any new significant impacts or “significant new information” that would require recirculation of the IS/MND pursuant to CEQA Guidelines Section 15073.5. It is noted that a portion of the comment letter was related to the RTP itself, and not the Initial Study. Such comments are noted in this response, but are not specifically addressed in this response to comments.

## 2 LIST OF COMMENTORS

Table 1 lists the comments on the IS/MND that were originally submitted to the DNLTC. The assigned comment letter number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed.

**TABLE 1 LIST OF COMMENTORS ON THE ORIGINAL IS/MND**

RESPONSE LETTER	INDIVIDUAL	AFFILIATION	DATE
A	Colin Fiske Tom Wheeler Joe Gillespie	Coalition for Responsible Transportation Priorities Environmental Protection Information Center Friends of Del Norte	1-19- 2020

## COMMENTS AND RESPONSES

### Errata

This document also includes minor edits and changes to the IS/MND. These modifications result from responses to comments received during the public review period for the IS/MND. These changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.

### Responses to Comment Letters

To assist in referencing comments and responses, the following coding system is used.

- Each comment within each letter is numbered (i.e., comment A-1, comment A-2).

# RESPONSE TO COMMENTS



January 19, 2021

Stephanie Alward  
Green Dot Transportation  
627 Broadway, Suite 220  
Chico, CA 95928

Tamera Leighton, Executive Director  
Del Norte Local Transportation Commission  
900 Northcrest Drive, PMB 16  
Crescent City, CA 95531

via email: [stephanie@greendottransportation.com](mailto:stephanie@greendottransportation.com); [tamera@dnltc.org](mailto:tamera@dnltc.org)

**RE: 2020 Del Norte County Regional Transportation Plan, Initial Study and Mitigated Negative Declaration**

Ms. Alward and Ms. Leighton:

Thank you for the opportunity to comment on the Draft 2020 Del Norte County Regional Transportation Plan (RTP), as well as the associated Initial Study (IS) and draft Mitigated Negative Declaration (MND). The Coalition for Responsible Transportation Priorities (CRTP), the Environmental Protection Information Center (EPIC), and the Friends of Del Norte submit the following comments. All cited page numbers, tables and figures refer to the RTP unless otherwise indicated.

## Public Transit

The RTP correctly notes that transit ridership has declined significantly in recent years as a result of Redwood Coast Transit Authority's reduction in service (p.28, p.33). This is a predictable pattern known as a transit "death spiral." The RTP also correctly notes the difficulty many transit riders and potential riders face in accessing bus stops along road networks without adequate pedestrian or bicycle facilities (p.33). Yet in spite of correctly diagnosing some of the major problems with the local transit system, the RTP makes no attempt to identify solutions, nor to establish goals, objectives and policies with the necessary ambition to address the problems. Instead, by establishing objectives such as to "tailor public transportation and transit service provisions to the area's population characteristics" and only to establish transit as a feasible mode choice "within the financial constraints of state and federal transit funding" (p.42), the RTP seems to be implicitly resigned to local transit providing only life-line transportation services. Finally, in its "COVID-19 Statement," the RTP state unequivocally that "transit

A-1

A-2

services will continue to be reduced and unpredictable” (p.5). This self-defeating approach will only result in furthering RCTA’s current “death spiral.”

A successful transit system requires not only transit-dependent riders, but also “choice” riders. Clearly, there are substantial challenges to recruiting such riders in a small, rural county like Del Norte. Nevertheless, there are several indications that the county has not exhausted the possibilities for transit system improvement, as follows:

1. Ridership actually increased in recent years on Route 199 (p.28, Table 2.23). The RTP should examine the sources of this success and apply lessons learned to the rest of the transit system.
2. The RTP establishes a policy of holding only one annual Unmet Transit Needs hearing (p.42, Policy 6.5) and one annual meeting of the Social Services Transportation Advisory Committee (p.42, Policy 6.10). The Unmet Transit Needs process and the SSTAC are both designed explicitly to gather public insights into how to meet local transit needs. As such, they are among the most likely sources of innovative ideas for improving local transit. But one meeting a year is simply not enough to gather adequate public input. The RTP should establish a much more robust public process.
3. One of the most promising emerging strategies for improving rural transit systems is coordinating traditional fixed-route systems with new mobility-on-demand solutions, operated either by the transit system itself or through a public-private partnership. When well designed, these strategies can help balance the requirement to meet the needs of transit-depend riders with the need to attract more “choice” riders in denser areas (i.e., Crescent City). The Humboldt County Association of Governments (HCAOG), the Regional Transportation Planning Agency for Del Norte’s neighbor to the south, has recently completed a strategic development plan for mobility-on-demand.<sup>1</sup> The RTP should look to HCAOG’s example and explore mobility-on-demand strategies for improving the local transit system.
4. The RTP projects an excess of transit funding available in both the short term and the long term (p.74, Table 5.2). Additionally, the RTP explicitly limits the possibilities for transit funding to only state and federal sources (p.42), failing completely to explore the possibilities of local funding sources or public-private partnerships. The RTP should identify all potential funding sources *and* make full use of all such sources for critical transit system improvements.

Finally, it is important to note an error in the RTP’s summary of the state’s zero emission vehicle mandates. The RTP currently states that transit fleets are subject to the state’s 2035 goal for all new vehicles to be zero-emission (p.36). In fact, transit fleets are also subject to the California Air Resources Board’s Innovative Clean Transit Rule, which requires 25% of new vehicles in small fleets to be zero-emission by 2026, and all new vehicles by 2029.<sup>2</sup>

### Active Transportation

The RTP accurately identifies the fact that needed pedestrian and bicycle facilities are lacking in much of Del Norte County (pp.31-2). The RTP also identifies many important strategies and specific

<sup>1</sup> See <http://hcaog.net/documents/mobility-demand-strategic-development-plan>.

<sup>2</sup> See <https://ww2.arb.ca.gov/rulemaking/2018/innovative-clean-transit-2018>.

A-2 Cont’d

improvements for local bicycle and pedestrian networks. However, the RTP's assessment of the issues, along with its proposed goals, objectives and policies, fall short in a number of important ways, as follows:

1. The RTP establishes an objective to improve walkability and bikeability only in downtown Crescent City (p.39). While it is true that the greatest demand for such improvements is in downtown Crescent City, there are also many urgently needed local bicycle and pedestrian improvements throughout the county, as well as completion of networks for regional connectivity. The RTP should establish objectives for improved walkability and bikeability throughout the county.
2. Proposed Policy 4.4 (p.40) calls for coordination among various agencies in the construction and maintenance of the local road system, but fails to identify the critical role of interagency coordination in constructing and maintaining bicycle and pedestrian infrastructure. We encourage you to address this omission.
3. The RTP completely fails to address electric pedal-assist bicycles ("e-bikes"). In rural areas like Del Norte County, with lots of elevation changes, e-bikes have enormous potential for allowing local residents to convert car trips to active transportation, helping to meet goals for reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT).<sup>3</sup> The RTP identifies the fact that many Del Norte residents have a very short commute to work, increasing the potential for mode shift, and e-bikes could play a critical role. The RTP should establish a goal and supporting objectives and policies to increase the use of e-bikes.
4. The RTP does not include any discussion of, or plans for, advisory bike lanes (also known as edge lane roads). This design technique has great potential for rapidly and inexpensively expanding and closing gaps in the active transportation network, particularly in small town and rural environments with relatively narrow rights-of-way. The RTP should include a discussion of advisory bike lanes.
5. The RTP identifies "establishing an adequate electric grid" as a critical solution for increasing "non-auto" transportation (p.37). Unless this is meant to refer specifically to charging infrastructure for electric buses or e-bikes, improvement of the electric grid is unrelated to non-auto transportation. Notably, if this idea is meant to refer to charging infrastructure for light-duty electric vehicles (EVs), such vehicles are still "autos" and improvement of the grid will do nothing to increase non-auto transportation.
6. Goal 2 of the RTP is to "support recreational travel by making it safe, easy and inviting," yet none of the supporting objectives or policies include strategies to improve the safety, comfort or convenience of recreational pedestrian and bicycle use of local and state roads. This is a critical oversight, particularly given the heavy recreational pedestrian use of major roads in the county—such as tourist use of Highway 199 in Jedediah Smith Redwoods State Park—as well as the popular Pacific Coast Bike Route which traverses the county. In fact, the RTP already identifies the fact that one of the top three problem areas for the PCBR on the entire Pacific Coast lies within Del Norte County (p.31), yet proposes no solutions. The RTP should propose objectives and policies for supporting recreational bike and pedestrian use of the local and state roads.

<sup>3</sup> See for example <https://www.localmotion.org/ebikes>.

A-2 Cont'd

7. A significant portion of identified “bicycle and pedestrian projects” in the RTP appear to actually be improvements to parking lots for cars (p.57). Even if such parking lots are intended to increase vehicular access to recreational trails, they cannot be counted as bicycle or pedestrian projects, as they primarily serve cars and trucks.
8. The RTP’s assessment of funding sources for bicycle and pedestrian projects is severely deficient. as follows:
  - a. The RTP assumes that the state’s Active Transportation Program (ATP) is the only potential source of funding for bike and pedestrian projects (p.56). This is demonstrably incorrect. For example, the State Highway Operation and Protection Program (SHOPP) can fund both safety and operational improvements—including for bicycles and pedestrians—on the state highway system. In fact, the California Transportation Commission recently approved a \$100 million set-aside for “complete streets” projects from the SHOPP, and both the CTC and Caltrans at the same time indicated a commitment to funding more active transportation projects through the SHOPP in the future. Yet the RTP inexplicably and incorrectly assumes no SHOPP funding for active transportation (p.74, Table 5.2).
  - b. In addition to the ATP and the SHOPP, active transportation projects can also be funded through the regional or interregional portions of the State Transportation Improvement Program (STIP). Such projects can also be funded from revenues such as the Highway Users Tax and the Local Streets and Roads Program, both of which are identified elsewhere in the RTP. In fact, the RTP projects a \$16.5 million excess in near-term road funding (p.74, Table 5.2), most or all of which could be used for active transportation projects. Such projects can also be funded through many local funding sources, including local agencies’ general funds. And they can even be funded through private grants or public-private partnerships.
  - c. The RTP assumes that no funding from the ATP or the Highway Safety Improvement Program (HSIP) will ever come to Del Norte County (p.72, Table 5.1). According to a presentation by RTP preparer Jeff Schwein to the DNLTC on January 12, 2021, this is a result of the fact that ATP and HSIP funding come through competitive grant programs. Nevertheless, the assumption of zero dollars from these programs in the future is unsupportable in the context of the state’s steadily increasing funding for active transportation (ranging from SB 1’s dramatic increase in ATP funding to the recent SHOPP complete streets set-aside). The state has committed to increasing active transportation mode share, and the RTP can only reasonably assume that increasing amounts of funding will be available from dedicated active-transportation sources such as the ATP, and that some of this funding will be awarded to projects in Del Norte County over the 20-year planning period if local agencies apply. Furthermore, other funding sources estimated in the RTP, such as the SHOPP, while not officially “competitive,” are nevertheless financially constrained, resulting in competition between various projects and priorities and uncertainty regarding future funding availability for projects in the county. This uncertainty does not prevent the RTP from estimating future funding from these sources, and should not prevent it from estimating ATP funding either.

A-2 Cont’d

The result of this overall deficient funding assessment is that the RTP identifies *no short-range bicycle and pedestrian projects* (p.56). Given the urgent need for bicycle and pedestrian safety and operational improvements in the region, as well as for reductions in VMT and GHG emissions, this outcome is completely unacceptable. The RTP must consider all potential funding sources, must make reasonable assumptions about the availability of funding from each of those sources, and must schedule urgently needed short-range bicycle and pedestrian improvements.

### Vehicle Miles Traveled, Traffic Volumes, and Congestion

The RTP consistently confuses the significance and relevant applications of measures of overall driving (VMT), localized traffic volumes, and traffic congestion. For example, while the RTP accurately notes that VMT is not a good measure of congestion (nor is it intended to be), it claims incorrectly that VMT *can* be used to identify “bottlenecks or high delay ‘hot spot’ locations” (p.23; see also IS p.66). In fact, VMT cannot and should not be used to indicate congestion or delay in any particular location, because it does not measure traffic in a given location at a given time nor compare traffic to capacity. Rather, VMT measures overall driving activity in a general area, and as such is a good proxy for many of the environmental and social costs of driving, including GHG and other emissions, safety and collision risk, etc. These are the primary reasons that VMT was chosen by the state as the new measure of transportation impacts under CEQA.<sup>4</sup>

In fact, VMT reduction and congestion relief are sometimes incompatible and conflicting goals. Efforts to reduce congestion often involve increasing vehicular capacity, a strategy which decades of research has shown leads directly to more driving (increased VMT). Efforts to reduce VMT, in contrast, may involve reduction in capacity as street space is reallocated to other modes, which can have the temporary effect of increasing congestion or delay (although over the longer term it tends to reduce driving). The apparent failure to grasp this distinction is evident in the RTP, which establishes overarching aims of both maintaining “adequate LOS” (i.e., minimum congestion) *and* prioritizing projects which reduce VMT (p.37). Separately, however, the RTP accurately identifies the fact that there are no real congestion problems in Del Norte County, and states that “expanding the traffic capacity of roadways is not a priority” (p.38). Level of Service and other congestion measures are generally irrelevant to both local and state goals and should be abandoned and removed from the RTP entirely.

The RTP’s assessment of recent VMT trends and projections of future VMT are also unsupportable. The RTP notes that local VMT has increased far out of proportion with population growth in recent years (p.23, p.37), but fails to investigate any potential causes for this trend. Instead, the RTP attempts to use this recent trend to forecast future traffic (p.20), which leads to estimates of continuing VMT growth (p.24, Table 2.20)—in spite of projections of substantial local population decline and local and statewide goals of VMT reduction. In order to meet the state’s GHG reduction goals, per capita VMT reductions must be achieved. Assuming constantly increasing VMT is planning for failure and is completely unreasonable in the face of a declining population. The RTP should analyze recent VMT increases, identify strategies to combat the trend, and reassess its future VMT projections.

<sup>4</sup> See <https://opr.ca.gov/ceqa/updates/sb-743/>.

A-2 Cont’d



Finally, the RTP establishes another overall aim of ensuring “adequate road width to support the travel and tourism industry” (p.37). It is not at all clear what this is intended to mean. However, if it is intended to mean that roads should be widened to accommodate new classes of vehicle, this would establish a policy of capacity increases that is internally inconsistent with the rest of the RTP. We encourage you to address this potential inconsistency.

## **Climate Change & Greenhouse Gas Emissions**

The RTP’s goals, objectives and policies do not reflect the needed ambition for targeting the climate crisis and meeting the state’s GHG reduction targets. For example, the RTP establishes an objective to “reduce or maintain” GHG emissions from transportation over the document’s 20-year planning horizon. In contrast, the state’s target, as dictated by climate science, is to achieve carbon neutrality—i.e., net zero GHG emissions—by 2045, just a few years beyond the RTP planning horizon.<sup>5</sup> Therefore, this objective is in direct conflict with proposed Policy 11.10, which is to “comply with state and federal climate change regulations and standards” (p.46). Del Norte may be a small county, but its residents have high per capita VMT and GHG emissions, and it must remain on track to meet state targets.

Part of the RTP’s climate ambition problem may stem from its assessment that the only way to reduce GHG emissions from transportation is to reduce or eliminate trips (p.45). This assessment ignores another major strategy, arguably even more important, which is transportation mode shift. As discussed at length above, there is much more the RTP should do to encourage a shift away from single-occupancy vehicles and toward transit and active transportation. The RTP also gives EV charging infrastructure, another major strategy, short shrift.

The RTP should focus significantly more on goals, objectives and policies to encourage mode shift and transportation electrification. Furthermore, we strongly recommend that the RTP go beyond minimum requirements and establish specific, quantitative, measurable targets for VMT and GHG emission reduction. HCAOG is in the process of establishing such targets for Humboldt County’s upcoming RTP update, and has recently released some preliminary draft targets. We recommend that the Del Norte Local Transportation Commission (DNLTC) follow HCAOG’s lead.

Finally, while the RTP recognizes the need to plan for sea level rise as a climate adaptation strategy (p.48), the document fails to address another risk that climate change poses, that of increasing frequency and severity of wildfires in the county’s inland areas. The RTP must address this critical threat to infrastructure and transportation safety.

## **Equity**

The RTP appropriately includes an objective and two supporting policies which encourage equity in transportation systems and programs (p.41, Policies 5.5 and 5.6). However, the wording of these policies is vague to the point of meaninglessness (“promote equity,” “work to make...equitably available”). The RTP’s Existing Conditions chapter includes a discussion of many of the reasons that transportation equity

<sup>5</sup> See <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>

A-2 Cont’d

is critical in Del Norte County, including high rates of poverty and disability, and many households without access to a vehicle. The RTP's Policy Element should increase its specificity and its ambition, describing actual targets and implementation actions. Furthermore, there should be equity policies which apply to all RTP areas, not just active transportation. For example, equity issues are also key in any reasonable assessment of transit and road planning.

### Goods Movement

Although the RTP does not specifically mention the long-planned 197/199 Safe STAA Access Project ("STAA project"), the project is mentioned in the MND (MND p.3), and the RTP contains many misleading statements and inappropriate policies which seem intended to bolster support for that project. For example, the RTP claims that Highways 101 and 197/199 "limit access for industry standard trucks" (p.34). There is not now, nor has there ever been, a standard truck for all industries and applications. Additionally, proposed Policy 8.3 is to "design roadways to current standards," which is presumably intended to refer to freight standards, as the policy supports a goods movement goal (p.44). However, there are no universal freight standards for road design. The policy may be intended to refer to STAA standards, but STAA standards only apply to the "National Network," which is the name generally applied to a designated set of large interstate highways (49 CFR §3111(b), California Vehicle Code Section 34501.5(a)), none of which are found in Del Norte County, and designated "Terminal Access" (TA) routes between the National Network and freight terminals or facilities (23 CFR §658.19, California Vehicle Code Section 34501.5(c)-(d)). STAA standards do not and were never intended to apply to all roads or highways.

The best principle for safe road design (p.44, Policy 8.2) is to design roads for local conditions and require vehicles to adapt accordingly, not vice versa. Moreover, designing roads to meet 1982 STAA truck standards is particularly inappropriate in the current industry context. Governor Newsom recently directed that all heavy-duty trucks be zero-emission vehicles by 2045, and autonomous vehicle technology is being deployed with increasing speed in the trucking industry. No one can predict what the trucks of the future will look like, except that they are unlikely to meet today's design specifications.

It is further important to note that Policy 8.3—and any other goals, objectives or policies calling for access for new classes of vehicles—would be in conflict with proposed Policy 11.3, which calls for prioritizing projects which do *not* increase vehicular capacity. Adding capacity for a new class of vehicle is a de facto capacity increase. Additionally, the RTP states clearly at p.47: "Should a capacity increasing project become a regional priority, it shall be initiated only when fully or largely funded by revenue sources that otherwise could not be used for maintenance activities." The STAA project would be funded in part by the SHOPP, the purpose of which is in fact to fund non-capacity increasing maintenance and repair projects.

The RTP should remove proposed Policy 8.3 and all other misleading references to freight transportation standards.

A-2 Cont'd

## Performance Measures

Some of the RTP's proposed Performance Measures do not appear to correlate reasonably with the proposed goals, objectives and policies, and are in some cases internally inconsistent or unclear:

- Performance Measure 1 is entitled "Transportation System Investments," but is apparently intended to measure roadway condition by distressed lane miles. This performance measure should be re-titled, as investment does not correlate directly roadway condition. Additionally, sub-measures should be added to track the condition of bicycle and pedestrian facilities as well.
- Performance Measure 2 is entitled "Preservation/Service Fuel Use/Travel Distance/Time/Cost." The title is overly broad and does not correlate with the intended metric, which is pavement condition. Furthermore, pavement condition measure essentially the same thing as distressed lane miles (Performance Measure 1). This measure should at minimum be re-titled. Preferably, it should actually establish metrics which measure reduction in fuel use and travel distance/time/cost and avoid redundancy with Performance Measure 1.
- Performance Measure 3 is intended to measure safety improvements. The RTP proposes to establish a baseline of traffic fatalities over a three-year period. However, for a population as small as that of Del Norte County, an accurate baseline cannot be established in such a short period, due to substantial random variation in the relatively low numbers of collisions. The RTP should increase its sample size by including injury collisions as well. DNLTTC may also wish to expand its options as well by employing a tool such as Street Story which records near misses and hazards.<sup>6</sup> Additionally, Table 4.7 describes this performance measure as "total accident cost." Cost, however, is not the same as the number or rate of crashes, which is the measure described in the document text (p.67). The actual performance measure should be clearly identified.
- Performance Measure 5 relies solely on cost per mile to assess the effectiveness of public transit. While cost is important, transit utilization is another key metric. Therefore, ridership should be added as another metric under Performance Measure 5.
- Performance Measure 6 is entitled "Congestion/Delay/VMT." As discussed above, congestion/delay and VMT are very different and sometimes opposing measures. In fact, however, it appears that the actual "congestion" metric proposed by the RTP is traffic volume rather than congestion or VMT. Traffic volume metrics reflect the number of cars and trucks on the road at a given time, but not how far they travel, their speed of travel, or any delay. It is unclear how traffic volumes measure anything of importance to the goals, objectives and policies of the RTP that is not more accurately measured by VMT. Therefore, this performance measure should be re-titled and should measure VMT only.
- Performance Measure 7 is entitled "Land Use Efficiency." We strongly support this as a performance measure, because increased land use efficiency can help achieve many of the RTP's goals related to active transportation, transit, VMT, and GHG emissions. However, no indication is given in the description on p.68 or in Table 4.7 on p.69 of the actual proposed metric for land use efficiency. The RTP should specify a metric which accurately measures land use efficiency.
- The RTP does not specify data sources for any of the proposed Performance Measures except Performance Measure 6 (p.69, Table 4.7). Knowledge of data sources is critical for ensuring that

A-2 Cont'd

<sup>6</sup> See <https://streetstory.berkeley.edu/>.

Performance Measures accurately indicate progress toward meeting the RTP's goals, objectives and policies. The RTP must specify data sources for all performance measures.

A-2 Cont'd

### CEQA Comments: Vehicle Miles Traveled & Greenhouse Gas Emissions

The IS/MND state variously that the RTP will cause no increase in VMT (IS p.28, IS p.66) and that the increase in VMT will be only "slight" (IS p.37) or "minimal" (IS p.67). In fact, the RTP and the IS itself project a VMT increase of over 10% over the planning period (p.24, IS p.42). Since Del Norte County's population is expected to decline over the same period (p.9, IS p.42), this translates into a projected 13% increase in per capita VMT. This is a prima facie significant increase.

The IS's hand-waving attempt to explain away this increase by simply citing Del Norte County's "rural nature" is not supportable (IS p.42). Even assuming arguendo that rural areas have inherently higher per capita VMT than urban areas, there is no reason to conclude that current per capita VMT cannot be reduced to some extent. Furthermore, there is certainly no reason to predict that Del Norte County will become *more* rural over the planning period in some way that might lead to the even greater per capita VMT projected by the RTP and the IS/MND. In fact, research indicates that there are many effective strategies for reducing VMT in rural areas.<sup>7</sup>

For the same reason, it cannot be reasonably argued that the projected VMT increase is a "background condition" not subject to CEQA analysis. Given the county's declining population and lack of plans for substantial new development, any increase in VMT must be attributable to planned changes in the transportation system, ergo, the RTP itself.

This major increase in both total and per capita VMT contradicts several of the IS/MND's assertions of less than significant impacts, as follows.

- The IS argues that the RTP will result in only a "slight change" in VMT, and thus concludes that transportation-related energy use impacts are less than significant (IS p.37). In fact, as described above, the project will result in substantial VMT increases, and thus potentially significant impacts from increases in transportation-related energy use.
- The IS asserts that the RTP's associated VMT increase is "minimal," and thus concludes that GHG emission impacts are less than significant (IS p.42). In fact, as noted above, a 10% overall and 13% per capita increase in VMT is prima facie significant. This obvious conclusion is strengthened by the fact that the Governor's Office of Planning and Research (OPR) recommends a CEQA significant threshold of 15% *below* existing per capita VMT in order to ensure consistency with state GHG reduction plans and targets.<sup>8</sup> The importance of reducing VMTs from a GHG perspective is even greater in a rural area like Del Norte County. While the IS notes that transportation accounts for "about a third of the GHG emissions in most areas" (IS p.42), that proportion is markedly higher in most rural areas. In neighboring Humboldt County, for example, transportation accounts for over half of emissions.<sup>9</sup> Therefore, the increase in VMT will result in potentially significant impacts from GHG emissions, as well as potentially significant

A-3

<sup>7</sup> See for example [https://opr.ca.gov/docs/Mitigating\\_Vehicle-Miles\\_Traveled\\_\(VMT\)\\_in\\_Rural\\_Development.pdf](https://opr.ca.gov/docs/Mitigating_Vehicle-Miles_Traveled_(VMT)_in_Rural_Development.pdf)

<sup>8</sup> [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

<sup>9</sup> <https://humboldt.gov/DocumentCenter/View/79805/PowerPoint-Presentation?bidId=>

impacts from conflicts with applicable GHG reduction plans ranging from the California Air Resources Board’s 2017 Scoping Plan<sup>10</sup> to Caltrans’ Strategic Management Plan, which calls for substantial reductions in both overall GHG emissions from transportation and per capita VMT.<sup>11</sup>

- The IS claims that the RTP will result in no VMT increases on local roadways, and therefore concludes that there will be no significant impact from conflicting with a transportation plan or policy nor any significant impact under CEQA Guidelines Section 15064.3(b) (IS p.66 et seq.). In fact, as noted above, the RTP will result in a significant increase in VMT, and thus a potentially significant impact from conflicts with several state plans. Furthermore, the IS itself quotes CEQA Guidelines Section 15064.3 as follows: “Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact.” The RTP clearly does not fall under this exemption, as it substantially increases VMT. In fact, given OPR’s recommended threshold of per capita VMT 15% below existing levels, it is clear that there is a potentially significant impact under CEQA Guidelines Section 15064.3(b).

A-3 Cont’d

Thus, the only reasonable and defensible conclusion is that the RTP will have several potentially significant impacts related to VMT increases which must be addressed through the CEQA process. A full Environmental Impact Report (EIR) may be warranted.

**Additional CEQA Comments**

We submit the following additional comments on the project’s draft MND and IS.

- The IS states that the RTP will “reduce congested conditions throughout the system while accommodating additional traffic generated by the increase in population projected for Del Norte County” (IS p.29). This statement contains two incorrect assertions. First, as noted above, the RTP establishes specifically that there are no congestion problems in Del Norte County and that capacity increases are not a priority (p.38). Second, the county’s population is projected to decline, not to increase (p.9, IS p.42). These errors should be corrected.
- The draft MND (MND p.6) and the IS (IS p.60) propose a mitigation measure to limit the noise-related impacts from the RTP that includes the following provision: “Establish speed limits and limits on hours of operation of transit systems.” While lowering speed limits is an established and evidence-supported method for reducing noise impacts, there is no reason to limit transit hours of operation in Del Norte County. The county’s transit system consists entirely of buses and other on-road vehicles, which should not be subject to any additional or greater restrictions than other on-road vehicles. The mitigation measure should be amended to remove references to transit.
- As noted above, Draft RTP Policy 8.3 appears to call for redesigning local roadways for new classes of freight vehicles. If this policy remains in the final document, it can be reasonably predicted that the result will be increased numbers of trucks on these roadways, some of which will carry hazardous materials. Many of the affected roadways, including Highways 101, 197 and 199, travel through sensitive natural habitats and adjacent to sensitive waterways. This would

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A-5

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<sup>10</sup> [https://ww2.arb.ca.gov/sites/default/files/2019-01/2017\\_sp\\_vmt\\_reductions\\_jan19.pdf](https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf)

<sup>11</sup> <https://dot.ca.gov/-/media/dot-media/programs/risk-strategic-management/documents/2019-csm-plan-update-a11y.pdf>

result in potentially significant impacts through both the routine transport of hazardous materials and a reasonably foreseeable increase in accident conditions, in contrast with the conclusion reached in the IS (IS p.44 et seq.). Thus, as long as Policy 8.3 remains in the RTP, a full EIR may need to be prepared to address these impacts.

- The IS concludes that the RTP will have a less than significant impact on wildfire risks (IS p.77). However, the IS fails to assess the implications of changes to wildfire frequency and severity due to global climate change, just as the RTP itself does (see above). The IS cannot reasonably conclude that wildfire impacts will be less than significant without considering predicted changes to the local wildfire regime and how they will interact with the transportation system.

A-6 Cont'd

A-7

Thank you for your consideration of our comments.

Sincerely,

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## Responses to the IS/MND Comments:

**Comment A:** Colin Fiske, Executive Director  
Coalition for Responsible Transportation Priorities

Tom Wheeler, Executive Director  
Environmental Protection Information Center

Joe Gillespie, President  
Friends of Del Norte

**Response A-1:** The commentor provides a brief introductory statement. This comment does not require a formal response.

**Response A-2:** The commentor provides several pages of comments that specifically target content provided in the Regional Transportation Plan. Because these comments are not directly targeting the CEQA document, a separate response to comments is provided for this section of the comment letter. Additionally, revisions/modifications to the Regional Transportation Plan that are a result of these comments are provided in a separate document.

**Response A-3:** The commentor provides the following comment regarding Vehicle Miles Traveled and Greenhouse Gas Emissions:

*The IS/MND state variously that the RTP will cause no increase in VMT (IS p.28, IS p.66) and that the increase in VMT will be only "slight" (IS p.37) or "minimal" (IS p.67). In fact, the RTP and the IS itself project a VMT increase of over 10% over the planning period (p.24, IS p.42). Since Del Norte County's population is expected to decline over the same period (p.9, IS p.42), this translates into a projected 13% increase in per capita VMT. This is a prima facie significant increase.*

*The IS's hand-waving attempt to explain away this increase by simply citing Del Norte County's "rural nature" is not supportable (IS p.42). Even assuming arguendo that rural areas have inherently higher per capita VMT than urban areas, there is no reason to conclude that current per capita VMT cannot be reduced to some extent. Furthermore, there is certainly no reason to predict that Del Norte County will become more rural over the planning period in some way that might lead to the even greater per capita VMT projected by the RTP and the IS/MND. In fact, research indicates that there are many effective strategies for reducing VMT in rural areas.<sup>7</sup>*

*For the same reason, it cannot be reasonably argued that the projected VMT increase is a "background condition" not subject to CEQA analysis. Given the county's declining population and lack of plans for substantial new development, any increase in VMT must be attributable to planned changes in the transportation system, ergo, the RTP itself.*

*This major increase in both total and per capita VMT contradicts several of the IS/MND's assertions of less than significant impacts, as follows.*

- *The IS argues that the RTP will result in only a "slight change" in VMT, and thus concludes that transportation-related energy use impacts are less than significant (IS p.37). In fact, as described above, the project will result in substantial VMT increases, and thus potentially significant impacts from increases in transportation-related energy use.*
- *The IS asserts that the RTP's associated VMT increase is "minimal," and thus concludes that GHG emission impacts are less than significant (IS p.42). In fact, as noted above, a 10% overall and 13% per*

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*capita increase in VMT is prima facie significant. This obvious conclusion is strengthened by the fact that the Governor's Office of Planning and Research (OPR) recommends a CEQA significant threshold of 15% below existing per capita VMT in order to ensure consistency with state GHG reduction plans and targets.<sup>8</sup> The importance of reducing VMTs from a GHG perspective is even greater in a rural area like Del Norte County. While the IS notes that transportation accounts for "about a third of the GHG emissions in most areas" (IS p.42), that proportion is markedly higher in most rural areas. In neighboring Humboldt County, for example, transportation accounts for over half of emissions.<sup>9</sup> Therefore, the increase in VMT will result in potentially significant impacts from GHG emissions, as well as potentially significant impacts from conflicts with applicable GHG reduction plans ranging from the California Air Resources Board's 2017 Scoping Plan<sup>10</sup> to Caltrans' Strategic Management Plan, which calls for substantial reductions in both overall GHG emissions from transportation and per capita VMT.<sup>11</sup>*

- *The IS claims that the RTP will result in no VMT increases on local roadways, and therefore concludes that there will be no significant impact from conflicting with a transportation plan or policy nor any significant impact under CEQA Guidelines Section 15064.3(b) (IS p.66 et seq.). In fact, as noted above, the RTP will result in a significant increase in VMT, and thus a potentially significant impact from conflicts with several state plans. Furthermore, the IS itself quotes CEQA Guidelines Section 15064.3 as follows: "Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact." The RTP clearly does not fall under this exemption, as it substantially increases VMT. In fact, given OPR's recommended threshold of per capita VMT 15% below existing levels, it is clear that there is a potentially significant impact under CEQA Guidelines Section 15064.3(b).*

*Thus, the only reasonable and defensible conclusion is that the RTP will have several potentially significant impacts related to VMT increases which must be addressed through the CEQA process. A full Environmental Impact Report (EIR) may be warranted.*

A response to this comment requires some clarifying information regarding the source of the VMT calculations, an explanation of the source of the trips within the VMT calculations, and the relationship of the VMT calculations to the residents of Del Norte County, as well as modifications to the text to amplify the analysis. A clarifying discussion is provided below, followed by errata changes to the Initial Study text.

As discussed on page 42 of the Initial Study, Del Norte County's population is projected to decrease by 4.0% between 2020 and 2040, which translates to an average annual decrease of 0.2%. Over the 20-year lifetime of the Regional Transportation Plan, the population is expected to decrease to 23,542 by 2040. On the same page, the Initial Study notes that the population decrease does not result in a VMT decrease. Instead, it states that the VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.

Like the commentor noted, the prima facie assumption would be that per capita VMT increases by 13% per capita; however, it is critical to look deeper into the source of the VMT calculations to understand the source of the trips and trip lengths. The VMT calculations include vehicle miles traveled on state highways that travel through Del Norte County, including those that did not originate in Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation



Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. It is fully appropriate for the VMT analysis in the RTP to account for these trips and trip lengths even though they do not originate and are not attributable to the residents of Del Norte County. What this VMT analysis illustrates is that the desire for non-residents to travel to, or through, Del Norte County is anticipated to grow over the planning horizon, and as a result the total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.

This comment requires revisions to the VMT discussion presented on page 28, 37, 42, and 66-68 of the Initial Study. The revisions are as follows:

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### *Isolated Rural Area*

A finding of conformity is required under Clean Air Act section 176(c) (42 U.S.C. 7506 (c)) to ensure that federally supported highway and transit project activities are consistent with (“conform to”) the State Implementation Plan (SIP). Conformity ensures that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the relevant national ambient air quality standards. Additionally, SIPs in California are developed to ensure conformity with the State ambient air quality standards.

While regional transportation conformity findings are required to approve RTPs in most places, they are not required for isolated rural areas, which includes the Del Norte Local Transportation Commission. Del Norte County is not part of an MPO, and regional planning is performed in part by Caltrans and the Del Norte Local Transportation Commission. RTP and TIP conformity requirements do not imply, instead regional conformity is done at the project level.

While the RTP provides improvements that will enhance the transportation system, it should be noted that it does not cause any increase in population or VMT. It is noted that VMT is anticipated to increase over the planning horizon as a result in trips/trip lengths that originate outside Del Norte County and travel to, or through, the planning area; however, this VMT is not attributed to the residents of Del Norte County, or the RTP policies, financing programs, or actions. Implementation of the RTP will not conflict with the Air Quality Plan, cause a violation of Air Quality Standards, contribute substantially to an existing air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant in a nonattainment area. Therefore, this impact is considered ***less than significant***.

Pg 37

**Responses a), b):** In Del Norte County, electricity is provided by PacifiCorp. Many residents and businesses in the County also rely on propane gas provided by a number of local franchises, as an energy source.

PacifiCorp sponsors several energy conservation programs that include education, solar energy incentives, florescent lighting business program and a weatherization program for low income

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families. These services are intended to reduce energy consumption in homes through the replacement of inefficient appliances and minor housing repairs, making the home more energy efficient. Consumers also receive valuable educational materials that provide useful energy saving tips and information.

Additional conservation measures can be encouraged through programs and policies that address areas within the County that can potentially reduce energy consumption by reducing wasteful energy consumption practices and habits.

Implementation of the proposed project would not result in new development, so there would be no development related energy needs generated by the proposed project. The transportation related energy needs for Del Norte County residents will decrease as a result of the decrease in population, and the decrease in total VMT by residents. However, this decrease in energy needs by County residents is more than offset by an anticipated increase in VMT from trips/trip lengths that originate outside of the County by visitors traveling to, or through, Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. These additional trips will result in additional energy demands for those trips. The total VMT increase is anticipated to be 0.52% per year, which will result in an equivalent energy increase. are largely unchanged given that VMT has only a slight change, coupled with the fact I is noted that fuel efficiency is increasing based on fuel standards that are being phased in over the next decade and these trips originating outside the County are anticipated to benefit from those new standards. As a result energy demands are anticipated to have an annual increase that is lower than the 0.52% annual increase in VMT.

Construction emissions will continue as projects are constructed; however, fuel efficiency standards and cleaner fuels for construction equipment are also being phased in and are anticipated to improve over the next decade.

Overall, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project operation of the plan, or during construction of individual projects. Additionally, the proposed project does not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Implementation of the proposed project would have a **less than significant** impact relative to this topic.

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~~Because of the rural nature of Del Norte County, the population decrease does not result in a VMT decrease. It is expected that VMT will increase minimally on Del Norte County roadways over the lifetime of the proposed project due to little or no population growth projected over the coming decades. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.~~

The population decrease does not result in a VMT decrease, however, instead it is expected that VMT will increase on Del Norte County roadways over the lifetime of the proposed project. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and

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2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.

The prima facie assumption would be that per capita VMT increases by 13% per capita; however, it is critical to look deeper into the source of the VMT calculations to understand the source of the trips and trip lengths. The VMT calculations include vehicle miles traveled on state highways that travel through Del Norte County, including those that did not originate in Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. It is fully appropriate for the VMT analysis in the RTP to account for these trips and trip lengths even though they do not originate and are not attributable to the residents of Del Norte County. What this VMT analysis illustrates is that the desire for non-residents to travel to, or through, Del Norte County is anticipated to grow over the planning horizon, and as a result the total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.

**TABLE GHG-1 PROJECTED VEHICLE MILES TRAVELED**

JURISDICTION	2020 DAILY VMT	2025 DAILY VMT	2030 DAILY VMT	2035 DAILY VMT	2040 DAILY VMT
Crescent City	28.9	29.6	30.3	31.1	31.9
Bureau of Indian Affairs	5.3	5.3	5.3	5.4	5.4
Del Norte County	199.6	201.6	203.6	205.7	207.7
National Park Service	5.1	5.1	5.1	5.2	5.2
State Highways	539.0	552.6	566.6	580.9	595.6
State Park Service	30.3	30.5	30.6	30.8	30.9
U.S. Forest Service	75.8	77.3	78.9	80.4	82.1
<b>Total</b>	<b>885.6</b>	<b>908.0</b>	<b>930.9</b>	<b>954.4</b>	<b>978.5</b>

SOURCE: DEL NORTE LOCAL TRANSPORTATION COMMISSION (2020)

The County does not have a GHG inventory, and is not subject to a GHG reduction target because it does not fall within a designated Metropolitan Planning Organization (MPO). The Del Norte Local Transportation Commission’s ability to address and mitigate climate change impacts is limited primarily to policy and funding decisions related to planned roadway and alternative transportation improvements. As described above, the combustion of fossil fuels during vehicle operations is the primary source of greenhouse gas (GHG) emissions in California, and it represents about a third of the GHG emissions in most areas. GHG emissions also result from the carbon dioxide, methane, and nitrous dioxide that are released during the combustion of gasoline and diesel fuel in construction equipment, vehicles, buses, trucks, and trains; and the use of natural gas to power transit buses and other vehicles.

Del Norte County has experienced slow growth in population and employment over the past two decades and is forecast to decline in population into the future. The County will continue to monitor population and employment and VMT growth consistent with the RTP, RTP performance measures,

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and local General Plans. As discussed above, total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.

This planning document recognizes that TDM and alternative mobility options, including walking, biking and transit require coordination with land use decisions and improved infrastructure. To this degree, the goals and policies in the RTP are still consistent with the County's General Plan to provide a balanced multi-modal transportation system that includes non-auto choices for access and mobility. Caltrans, the County, the City of Crescent City, and tribal governments are committed to implementing policies and strategies to reduce reliance on motorized vehicles where possible.

As discussed above, implementation of the RTP will not conflict with AB 32 or SB 375. Furthermore, the RTP does not result in any significant amount of VMT or population growth. Therefore, this impact is considered *less than significant*.

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**Responses a-b):** Implementation of the RTP would support a number of transportation projects throughout the County, including roadway, transit, bicycle, and pedestrian. Some of the projects involve transportation operations, while others involve safety enhancements or maintenance. The long-term operation of these facilities is anticipated to have beneficial impacts and are considered to be consistent with local plans, policies, and ordinances.

IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT RESULT IN POPULATION GROWTH WITHIN DEL NORTE COUNTY AND WOULD NOT DIRECTLY RESULT IN DECREASES IN LOS OR INCREASES IN VMT ON AREA ROADWAYS. It is noted that VMT is anticipated to increase over the planning horizon as a result in trips/trip lengths that originate outside Del Norte County and travel to, or through, the planning area; however, this VMT is not attributed to the residents of Del Norte County, or the RTP policies, financing programs, or actions. THE PROPOSED PROJECT WOULD IMPROVE TRAFFIC FLOWS AND OPERATIONS THROUGHOUT THE COUNTY, EMPHASIZING SAFETY CONCERNS, AND WOULD NOT RESULT IN A CONFLICT WITH TRANSPORTATION PLANS, POLICIES, OR ORDINANCES. IMPLEMENTATION OF THE PROPOSED PROJECT WOULD HAVE A **LESS THAN SIGNIFICANT** IMPACT RELATIVE TO THIS ISSUE, AND NO MITIGATION IS REQUIRED.

**Responses b):** Reducing vehicle miles traveled has become one of the top priorities for Local and State agencies involved in transportation, in alignment with State and Federal legislation setting goals for greenhouse gas reductions. Vehicle miles of travel (VMT) is a general but robust measure of vehicle activity. It measures the extent of utilization a transportation network experiences by motorists. Although it is not a good indicator of congestion, it is a great indicator of overall vehicle activity, identifying bottlenecks or high delay "hotspot" locations. VMT is commonly applied on a per-household or per-capita basis and is a primary input for regional air quality analyses and for developing VMT rates for safety analysis. Per Senate Bill 743 (Steinberg, 2013), VMT is now the basis for transportation impact identification and mitigation under the California Environmental Quality Act (CEQA). However, jurisdictions must also ensure consistency with current land use plans, some of which still utilize Level of Service as a primary metric.

VMT data is annually reported as part of the Federal Highway Performance Monitoring System (HPMS) program. The HPMS program uses a sample-based method that combines traffic counts stratified by functional classification of roadways by volume groups to produce sample based

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geographic estimates of VMT. HPMS VMT estimates are considered “ground truth” by the 1990 Federal Clean Air Act Amendments (November 15, 1990). HPMS VMT estimates are used to validate baseline travel demand models and to track modeled VMT forecasts over time. HPMS VMT estimates are reported for each county by local jurisdiction, state highway use, and other state/federal land roadways e.g., State Parks, US Bureau of Land Management, US Forest Service, US Fish and Wildlife Service.

Estimates of countywide VMT for Del Norte County for the four most recent years available (2015-2018) are provided in Table Traffic-1. As shown, VMT has consistently increased over all county roadways during this four-year period. See Table Traffic-2 for projected VMT on Del Norte County roadways.

**TABLE TRAFFIC-1 EXISTING VEHICLE MILES TRAVELED**

JURISDICTION	2015 DAILY VMT	2016 DAILY VMT	2017 DAILY VMT	2018 DAILY VMT	CHANGE, 2015-2018	AVERAGE ANNUAL CHANGE, 2015-2018
Crescent City	22.8	22.9	28.5	28.6	20.2%	6.7%
Bureau of Indian Affairs	5.0	5.0	5.3	5.3	4.3%	1.4%
Del Norte County	184.4	208.8	198.1	198.8	7.3%	2.4%
National Park Service	4.9	4.9	5.2	5.1	4.0%	1.3%
State Highways	439.3	492.2	492.2	533.7	17.7%	5.9%
State Park Service	29.3	29.3	30.6	30.3	3.2%	1.1%
U.S. Forest Service	65.5	65.0	69.1	75.2	12.8%	4.3%
<b>Total</b>	<b>751.2</b>	<b>828.1</b>	<b>829.1</b>	<b>876.8</b>	<b>14.3%</b>	<b>4.8%</b>

SOURCE: 2010 - 2018 CALIFORNIA PUBLIC ROAD DATA

**TABLE TRAFFIC-2 PROJECTED VEHICLE MILES TRAVELED**

JURISDICTION	2020 DAILY VMT	2025 DAILY VMT	2030 DAILY VMT	2035 DAILY VMT	2040 DAILY VMT
Crescent City	28.9	29.6	30.3	31.1	31.9
Bureau of Indian Affairs	5.3	5.3	5.3	5.4	5.4
Del Norte County	199.6	201.6	203.6	205.7	207.7
National Park Service	5.1	5.1	5.1	5.2	5.2
State Highways	539.0	552.6	566.6	580.9	595.6
State Park Service	30.3	30.5	30.6	30.8	30.9
U.S. Forest Service	75.8	77.3	78.9	80.4	82.1
<b>Total</b>	<b>885.6</b>	<b>908.0</b>	<b>930.9</b>	<b>954.4</b>	<b>978.5</b>

SOURCE: DEL NORTE LOCAL TRANSPORTATION COMMISSION (2020)

It is expected that VMT will increase minimally on Del Norte County roadways over the lifetime of the proposed project due to little or no population growth projected over the coming decades. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day. The population decrease does not result in a VMT decrease, however, instead it is expected that VMT will increase on Del Norte County roadways over the lifetime of the proposed

## RESPONSE TO COMMENTS

project. VMT in Del Norte County will increase at an estimated rate no greater than 0.52% annually between 2020 and 2040, a total of 10.49% over 20 years. Total VMT in 2040 is anticipated to be 978.5 vehicle miles traveled per day.

The prima facie assumption would be that per capita VMT increases by 13% per capita; however, it is critical to look deeper into the source of the VMT calculations to understand the source of the trips and trip lengths. The VMT calculations include vehicle miles traveled on state highways that travel through Del Norte County, including those that did not originate in Del Norte County. For instance, in Del Norte County there are recreational designations for visitors that begin their trip in other parts of the State of California, and in some cases, outside the State entirely. These trips are anticipated to occur with, or without, the Regional Transportation Plan, and are independent of an increase or decrease in population in Del Norte County. Instead, they are a function of the desire of people to travel to, or through, Del Norte County for a variety of reasons. It is fully appropriate for the VMT analysis in the RTP to account for these trips and trip lengths even though they do not originate and are not attributable to the residents of Del Norte County. What this VMT analysis illustrates is that the desire for non-residents to travel to, or through, Del Norte County is anticipated to grow over the planning horizon, and as a result the total VMT is anticipated to increase in spite of the declining population. The total VMT attributed to residents is anticipated to decline at the same rate as the population decline, but this reduction is more than offset by the increase in visitors over the planning horizon.

Section 15064.3 of the CEQA Guidelines states that “Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact...” Given that VMT increases over the next 20 years are projected to be ~~very slight~~0.52% annually, the source of the annual increase is non-residents that are traveling to, or through Del Norte County, the VMT from residents is anticipated to decrease with the overall population decrease, and the individual improvements programed under the RTP are not anticipated to ~~have an impact on drive~~ VMT increases given they are prioritized to be safety improvements, implementation of the proposed project would have a **less than significant** impact relative to topic, therefore no mitigation is required.

**Responses c):** The RTP prioritizes safety improvements, and includes roadway projects designed to ~~alleviate existing and anticipated future congestion issues and to~~ reduce traffic hazards. Figure 3 and 4 illustrate traffic collisions, which represent hazards that warrant improvements. The RTP includes long range planning and financing efforts to improve conditions such that the risk of collisions is reduced.

While the RTP includes numerous projects that will involve a design/engineering process, the project-specific designs and plans for these improvements are not available for analysis at this time. However, consistent with agency practice, all improvements will be designed to the standards and specifications of Caltrans or the appropriate implementing agency. As such, the proposed project is not anticipated to cause a substantial increase in hazards due to design features or incompatible uses. Therefore, the potential impacts on safety and compatibility are considered **less than significant**, and no mitigation is required.

**Response A-3:** The commentor provides the following comment regarding Vehicle Miles Traveled and Greenhouse Gas Emissions:

*The IS/MND state variously that the RTP will cause no increase in VMT (IS p.28, IS p.66) and that the increase in VMT will be only “slight” (IS p.37) or “minimal” (IS p.67). In fact, the RTP and the IS itself project a VMT increase*

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of over 10% over the planning period (p.24, IS p.42). Since Del Norte County's population is expected to decline over the same period (p.9, IS p.42), this translates into a projected 13% increase in per capita VMT. This is a prima facie significant increase.

This comment is noted, and it addressed under A-3 Response and errata changes.

**Response A-5:** The commentor provides the following additional CEQA comments:

### ***Additional CEQA Comments***

*We submit the following additional comments on the project's draft MND and IS.*

- *The IS states that the RTP will "reduce congested conditions throughout the system while accommodating additional traffic generated by the increase in population projected for Del Norte County" (IS p.29). This statement contains two incorrect assertions. First, as noted above, the RTP establishes specifically that there are no congestion problems in Del Norte County and that capacity increases are not a priority (p.38). Second, the county's population is projected to decline, not to increase (p.9, IS p.42). These errors should be corrected.*

This comment requires revisions to the Localized Carbon Monoxide discussion presented on page 29 of the Initial Study. The revision is as follows:

~~Del Norte County is designated unclassified for CO at the state federal level. The RTP projects are designed to improve traffic flows and reduce congestion system wide, reducing the potential for CO "hot spots" that can occur from exhaust of idling cars waiting to clear a heavily congested intersection or crossing. The RTP projects are intended to reduce congested conditions throughout the system while accommodating additional traffic generated by the increase in population projected for Del Norte County. Del Norte County does not have major congestion problems, which are generally the source of CO hot spots. Due to the lack of congestion, Del Norte County is designated unclassified for CO at the state federal level.~~

It is noted that the population of Del Norte County is projected to decrease by 4.0% between 2020 and 2040, which translates to an average annual decrease of 0.2%. Over the 20-year lifetime of the Regional Transportation Plan, the population of 24,528 is expected to decrease to 23,542 by 2040. With low traffic volumes and a decreasing population, expanding the traffic capacity of roadways in Del Norte County is not a priority. Safety and operational improvements and maintenance of the existing system to ensure connectivity are of central importance. As such, the RTP projects are designed to improve safety, maintain regional roadways, and ensure connectivity to Humboldt County, Curry County and Josephine County.

The potential for CO hot spots in Del Norte County is highly unlikely do to the existing traffic conditions, which lacks congestion, as well as the anticipated decrease in population over the planning horizon. This is considered a ***less than significant*** impact.

The above revision fully addresses the concern and recommendation provided by the commenter.

**Response A-6:** The commentor provides the following additional CEQA comments:

- *The draft MND (MND p.6) and the IS (IS p.60) propose a mitigation measure to limit the noise-related impacts from the RTP that includes the following provision: "Establish speed limits and limits on hours*

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*of operation of transit systems.” While lowering speed limits is an established and evidence-supported method for reducing noise impacts, there is no reason to limit transit hours of operation in Del Norte County. The county’s transit system consists entirely of buses and other on-road vehicles, which should not be subject to any additional or greater restrictions than other on-road vehicles. The mitigation measure should be amended to remove references to transit.*

This comment requires revisions to Mitigation Measure 13 presented on page 6 of the MND and page 60 of the Initial Study. The revision is as follows:

### MITIGATION MEASURE

**Mitigation Measure 13:** *Prior to approval of new construction projects adjacent to noise-sensitive uses, the implementing agency shall perform a project-level noise evaluation. The implementing agencies shall consider the following measures:*

- *Construct vegetative earth berms with mature trees and landscaping to attenuate roadway noise on adjacent residences or other sensitive use, and /or sound walls or other similar sound-attenuating buffers, as appropriate.*
- *Design projects to maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, transit centers, park-and-ride lots, and other new noise generating facilities.*
- *Establish speed limits ~~and limits on hours of operation~~ of transit systems.*

The above revision fully addresses the concern and recommendation provided by the commenter.

### Response A-7: The commentor provides the following additional CEQA comments:

- *As noted above, Draft RTP Policy 8.3 appears to call for redesigning local roadways for new classes of freight vehicles. If this policy remains in the final document, it can be reasonably predicted that the result will be increased numbers of trucks on these roadways, some of which will carry hazardous materials. Many of the affected roadways, including Highways 101, 197 and 199, travel through sensitive natural habitats and adjacent to sensitive waterways. This would result in potentially significant impacts through both the routine transport of hazardous materials and a reasonably foreseeable increase in accident conditions, in contrast with the conclusion reached in the IS (IS p.44 et seq.). Thus, as long as Policy 8.3 remains in the RTP, a full EIR may need to be prepared to address these impacts.*

Transportation of hazardous materials is addressed on page 44 of the original circulated Initial Study, which states:

**Response a):** Construction of the individual RTP projects may involve the transportation, use, and/or disposal of hazardous materials, which may involve the use of equipment that contains hazardous materials (e.g., solvents and fuels, diesel-fueled equipment), or the transportation of excavated soil and/or groundwater containing contaminants from areas that are identified as being contaminated. However, the transportation of hazardous materials is heavily regulated and monitored by federal, state, and local regulations and policies. All transportation of hazardous materials, if any, will be required to comply with all existing regulations and policies. Compliance with all existing regulations and policies would ensure that the impact would be **less than significant**, and no additional mitigation is required.



This Initial Study discussion is correct. The Initial Study notes that there is the potential for transportation, use, and/or disposal of hazardous materials, which may involve the use of equipment that contains hazardous materials (e.g., solvents and fuels, diesel-fueled equipment), or the transportation of excavated soil and/or groundwater containing contaminants from areas that are identified as being contaminated. The Initial Study also correctly notes that the transportation of hazardous materials is heavily regulated and monitored by federal, state, and local regulations and policies. All transportation of hazardous materials, if any, will be required to comply with all existing regulations and policies. This includes having proper placarding, documentation of the material to be transported, the origination and destination of the trip, and the travel route. Travel routes for hazardous materials are established by federal, state, and local agencies following the 49 U.S. Code § 5112 - Highway routing of hazardous material. This includes designating specific highway routes over which hazardous material may and may not be transported by motor vehicle; and limitations and requirements related to highway routing. The RTP does not include any specific policies that aim to designate a travel route for hazardous materials.

**Response A-8:** The commentor provides the following additional CEQA comments:

- *The IS concludes that the RTP will have a less than significant impact on wildfire risks (IS p.77). However, the IS fails to assess the implications of changes to wildfire frequency and severity due to global climate change, just as the RTP itself does (see above). The IS cannot reasonably conclude that wildfire impacts will be less than significant without considering predicted changes to the local wildfire regime and how they will interact with the transportation system.*

Wildfire is addressed on page 47 and 77 of the original circulated Initial Study, which states:

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**Response g):** The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

Wildfires are a major hazard in the State of California. Wildfires burn natural vegetation on developed and undeveloped lands including timber, brush, woodland, and grass fires. While low intensity wildfires have a role in the County's ecosystem, the intensity and frequency of wildfires is exacerbated due to extended droughts and climate change, and puts human health and safety, structures (e.g., homes, schools, businesses, etc.), air quality, recreation areas, water quality, wildlife habitat and ecosystem health, and forest resources at risk.

Del Norte County has areas with the appropriate fuel loading, and topography for wildfire. When this is combined with dry summers and higher temperatures, the risk of wildfire increases substantially. Most wildland fires are human caused, so areas with easy human access to land with the appropriate fire parameters generally result in an increased risk of fire.

The individual RTP improvement projects would not result in the construction of structures that would be occupied by humans; therefore, it would not expose people or structures to a significant risk involving wildfires. The RTP provides for improvements to transportation systems throughout the County, which is expected to improve the ability for fire protection services to access areas that have a high wildfire risk rating. Therefore, there is **no impact**.

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**Responses a), b), c), d):** The proposed project is a regional planning effort developed by the Del Norte Local Transportation Commission that covers all of Del Norte County. The planning area includes “Very High” Fire Hazard Severity Zones within the State Responsibility Area (SRA), as determined by CAL FIRE. The individual improvements projects would not result in new structures in these areas, but would improve connectivity within the planning area, thereby allowing improved management of wildfires within the planning area. Therefore, the proposed project would not impair an adopted emergency response plan or emergency evacuation plan, exacerbate wildfire risks, or expose people or structures to significant wildfire risks.

Nevertheless, there exists the possibility that proposed project could require the installation or maintenance of infrastructure associated with the proposed project that could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, the potential for individual projects to exacerbate fire risk or result in temporary or ongoing environmental impacts due to the installation or maintenance of associated infrastructure will need to be analyzed on a project-by-project level.

Project site specific design is not currently available for RTP improvement projects; therefore, the location of associated infrastructure is yet to be determined. Therefore, installation or maintenance of associated infrastructure would be evaluated on a project-by-project basis as part of the CEQA process prior to project approval. Since site specific design details are not currently available, each agency will need to do a project specific review by the implementing agency prior to project approval. Implementation of a project-level review would reduce this potentially significant impact to a less than significant level.

These discussions of wildfire as it relates to the Regional Transportation Plan are accurate. The discussions note that: 1) wildfire is a major hazard in California, 2) Del Norte County has areas with the appropriate fuel loading, topography, and seasonal weather for wildfire, 3) Del Norte County has easy human access to land with the appropriate fire parameters, 4) Del Norte County includes “Very High” Fire Hazard Severity Zones within the State Responsibility Area (SRA), as determined by CAL FIRE. and 5) the intensity and frequency of wildfires in Del Norte is exacerbated due to extended droughts and climate change, and puts human health and safety, structures (e.g., homes, schools, businesses, etc.), air quality, recreation areas, water quality, wildlife habitat and ecosystem health, and forest resources at risk.

By providing these statements in the Initial Study in two separate discussions it is clear that the discussion is not intended to, and does not suggest that “wildfire” itself is an insignificant concern in Del Norte County. Instead, the insignificance determination is based on the fact that the RTP itself is not the cause of wildfire, and does not include any specific policy, financing, or action that would cause a wildfire impact. To dive deeper into the analysis, we must first explore five

questions/thresholds that are established in Appendix G of the CEQA Guidelines and serve as the basis for analyzing wildfire impacts. Each are presented below:

## IX. HAZARDS AND HAZARDOUS MATERIALS

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

## XX. WILDFIRE

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
d) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

To answer these questions, the regional transportation planning effort developed by the Del Norte Local Transportation Commission (the Del Norte RTP) does not include actions that would physically expose people or structure to wildfire, does not physically impair an adopted emergency response plan, and does not physically cause downstream/slope risk of flooding/landslides from past fire. The RTP is a written document that includes transportation policies, financing programs, and actions to improve the transportation system, with a priority on safety improvements. The RTP has no impact, or a less than significant impact relative to each of these questions.

It is noted on Pg 77 of the Initial Study that *“there exists the possibility that proposed project could require the installation or maintenance of infrastructure associated with the proposed project that could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.”* Pg 77 further states that *“the potential for individual projects to exacerbate fire risk or result in temporary or ongoing environmental impacts due to the installation or maintenance of associated infrastructure will need to be analyzed on a project-by-project level...Project site specific design is not currently available for RTP improvement projects; therefore, the location of associated infrastructure is yet to be determined. Therefore, installation or maintenance of associated infrastructure would be evaluated on a project-by-project basis as part of the CEQA process prior to project approval. Since site specific design details are not currently available, each agency will need to do a project specific review by the implementing agency prior to project approval. Implementation of a project-level review would reduce this potentially significant impact to a **less than significant level.**”* This discussion is accurate where it indicates that the possibility exists that a project construction effort could result in increased wildfire risk, but it is too speculative to definitively conclude that the impact level is significant. It is more reasonable to expect that the implementing agency, along with the

construction contractor, would implement best management practices during construction to ensure that risks of wildfire originating from the construction effort of transportation projects are reduced to insignificant levels. This is considered a reasonable assumption, and not speculative, because both the implementing agency and contractor have it in their best financial interest to not use a construction method that elevates wildfire risk. This, however, will be validated once individual projects designs are developed and taken forward for approval.

It is important to understand that these conclusions of insignificance does not mean that wildfire risk does not exist in Del Norte County, or that wildfire is not a major concern, instead it means that the risks are not created by the RTP's policies, financing programs, or actions.