



June 28, 2016

Chair Bob Alvarado & Commissioners  
California Transportation Commission  
via email to Executive Director Susan Bransen at [susan.bransen@dot.ca.gov](mailto:susan.bransen@dot.ca.gov)

RE: Smith River Curve Improvement Project

Chair Alvarado and Commissioners:

At your June 29-30, 2016 meeting, you will be asked to approve a set of improvements to US 199 in Del Norte County called the “Smith River Curve Improvement Project” for consideration of future funding. **We strongly urge you to investigate certain possible effects of this project more thoroughly before providing such approval.**

The project is listed in the adopted 2014 SHOPP, where the improvements are described simply as “widen shoulders.” Our organizations’ previous understanding of this project was based on this description. Therefore, we were surprised to see the full description of the project in your June 29-30 meeting book as “realign curves, widen lanes and shoulders, construct a viaduct and bridge, and make other improvements.”

You may be aware that Caltrans District 1 has for many years been pursuing another project to realign other curves, widen lanes and shoulders, and construct related improvements on US 199 and SR 197 for the purpose of allowing STAA trucks on these routes. The “197/199 Safe STAA Access Project” has been the subject of litigation by EPIC and other organizations, and Caltrans is currently in the process of conducting additional court-ordered environmental review.

Environmental documents for the 197/199 Safe STAA Access Project state: “Because it would provide STAA truck access on the SR 197–US 199 corridor between U.S. Highway 101 (US 101) and the Oregon state line, where STAA truck access is already provided on US 199, the combined need for improvements at the seven project locations has independent utility (i.e., it creates one stand-alone project that is a reasonable expenditure even if no additional transportation improvements in the area are made).” In other words, Caltrans recognizes that all improvements on US 199 and SR 197 required to allow STAA truck access between US 101 and the Oregon state line must be considered as “one stand-alone project.”

However, the 1999 Route Concept Report for the US 199 corridor identifies an additional location, not included in the STAA project description, where improvements would need to be made to allow STAA truck access. This location is between PM 8.2 to PM 9.8. The location for the Smith River Curve Improvement Project, between PM 8.0 and PM 8.5, overlaps with this location.

The proposed Negative Declaration identifies it as a collision reduction project and does not mention STAA trucks. We do not wish to stand in the way of a project which will truly improve safety on US 199. However, based on the available descriptions of the project, the information provided in the 1999 Route Concept Report, and our own first-hand knowledge of conditions on US 199, it seems likely that this project will result in removal of a current impediment to STAA truck access on US 199. **If this is the case, the Smith River Curve Improvement Project must be incorporated into the 197/199 Safe STAA Access Project and cannot move forward independently.** To allow it to move forward independently would be to sanction a violation of environmental laws by allowing piecemeal analysis of the STAA project's impacts.

We strongly urge you to investigate both the planned and the reasonable predictable effects of the Smith River Curve Improvement Project. If the project will have the effect of removing any current impediment(s) to STAA truck access between US 101 and the Oregon border, you must not allow it to move forward at this time.

Thank you for giving our comments careful consideration.

Sincerely,



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