Preserving and Enhancing Paradise in the Humboldt Redwoods

Contributed by concerned citizens against sprawl
10 May 2009

Editor's introduction: While it's important to fight off the road builders who don't care about our common heritage of ancient redwoods, we must see the real reasons behind schemes. The idea in the case of California Transportation Dept. (CalTrance) highway "upgrades" is to pave over more of Humboldt County for corporate profit.

If you've ever taken a vacation in coastal-redwood country, you've seen awesome, beautiful trees right up against the edge of the narrow two-lane stretch of Highway 101 in southern Humboldt County. These redwoods, a species taller than any other living thing, represent the "beauty strip" when compared to the ravaged forest that has been stripped of over 95% of its old growth. Some activists who may not be tree-sitters for Earth First! are nevertheless fighting the good fight on the ground to include the bigger picture.

The vitality of 28-30 ancient redwood trees in Richardson Grove is likely to be damaged by root compaction, cutting, hydrologic change, fill and other consequences of proposed CalTrans road construction activity. Most of the ancient trees are 4 to 15 feet in diameter, some 1000-2000 years old and over 300 feet tall. Redwood trees have lateral root systems that extend 4-6 feet deep and 125 feet out from the tree. If the construction plan goes through, 27 trees up to two feet in diameter could be cut in the Park, in addition to 58 trees outside the Park.

The following report was sent to Culture Change by concerned citizens against urban sprawl (saverichardsongrove.org), diverse activists in Humboldt County, California. It brilliantly points out the connection between the Hwy. 101 scheme through Richardson Grove and what we reported on last month: the Foster Avenue pave-the-wetland scheme out of "cArcata" City Hall:

Once the bottlenecks through Richardson Grove and over Buckhorn Summit are breached, it is likely that increased truck traffic will traverse our cities and counties as a direct link to the Bay Area, Portland, and Redding. Currently, that traffic mostly occurs on I-5. These are big, noisy (especially on grade) diesel trucks. Justification for “improving” municipal roadways to accommodate these trucks will surely follow (e.g. Arcata public works proposes widening Foster Ave to accommodate trucks).

This report advocates non-fossil fuel alternatives as opportunities to improve quality of life, local economics and environmental protection. The "short-sea shipping" idea can be about ships with sails; indeed, Humboldt Bay was a magnificent port of call and tall-ship building center a hundred years ago. The Sail Transport Network has begun promoting the return of sail for the coast.

- Ed.

Reassessing the Richardson Grove Highway Project:
A Consideration of the Consequences and Alternatives

Bottom Line: We Can And Must Do Better

The current broad public discussion concerning the Richardson Grove Highway Project provides an unprecedented opportunity for North Coast communities to seek federal funding for the development of alternative transportation modalities, powered by non-fossil fuels, to meet the economic and ecological needs of our community. Short-sea shipping, for example, could serve coastal communities and help develop our Port in an appropriate way. Our academic, technical, labor, non-profit, business and government resources could collaborate on alternative initiatives that would avoid the need for disturbing Richardson Grove, a project that relies on anachronistic transport modalities and could foster uncontrollable and unwanted development.

Humboldt County will suffer significant adverse impacts if the Richardson Grove road project is approved. The project is too big, too consequential, and too transformative to be pushed through by CalTrans and the County Economic Development Department.

We believe that this project's impacts on traffic through the county, its likely economic downsides, its risks to old growth redwood habitat, and its preclusion of better alternatives are matters of grave public concern.

The Richardson Grove Project is linked to two other STAA (Surface Transportation Assistance Act of 1982) truck access bottlenecks, one over Highway 299 at Buckhorn Summit, and the other along Highways 199/197 in Del Norte County along the Middle Fork Smith River. STAA truck traffic will then facilitate interstate and interregional commerce, as well as the unexamined potential for sprawl development along these routes as large franchise operations benefit from the efficient delivery systems. The risk to local businesses remains unevaluated but is clearly significant. Richardson Grove is critical Marbled Murrelet habitat, yet population demographics are unknown, and Caltrans proposes to survey for the endangered seabird only after the project. Analogously, the consequences of redwood root compaction and other disturbances related to the Project on the vitality of 28-30 ancient redwood trees are unknown.

Caltrans has narrowly construed the purpose of the Project to allow STAA access through the Grove, rather than to facilitate the movement of goods into and out of the County. Consequently, no feasible, reasonable alternatives are, or can be, considered.

However, approval of the project is not inevitable.

Fortunately, the Richardson Grove Project (RGIP) provides a perfect opportunity to advance an alternative vision.

In order to proceed effectively, one must understand some critical facts and embrace a broad-based and wholesome vision for our region that enhances rather than degrades our quality of life.

Purpose of the Richardson Grove Project

The stated purposes of the RG Project are to accommodate large diesel trucks, improve safety, and facilitate the movement of "goods" in order to help local businesses stay competitive.

The Richardson Grove widening project is part of the larger effort to "improve" sections of U.S. Highway 101, and California State Highways 299 (Buckhorn Summit), 197 and 199 that currently do not allow passage of larger "STAA" (Surface Transportation Assistance Act) trucks. These trucks have trailers as long as 53 feet; double trailers have no length limits, whereas "California Legal" double trailers are limited to 65-75 feet. Existing conditions limit trailer lengths to 28 feet, except for those with waivers, such as livestock carriers and moving vans.

In considering the Richardson Grove Project as an isolated project separate from the other STAA access endeavors, CalTrans may violate the California Environmental Quality Act (CEQA) and the National Environmental Protection Act (NEPA). Such a narrowly construed definition necessarily precludes adequate consideration of environmentally preferable alternatives.

Additionally, these other proposed projects may satisfy the need for STAA access to the Northcoast without disturbing Humboldt Redwoods State Park. If so, then the CalTrans Richardson Grove Project may violate federal law, which allows the Secretary of Transportation to approve a transportation project involving land in a public park only if "... there are no feasible and prudent alternatives..." (49USC§303). An Environmental Impact Statement, rather than an Environmental Assessment, is the appropriate response to federal regulations.

Other reasonable alternatives to highway transport that could meet local business needs have not been considered. (See below.)

The Headwaters Forest Fund

In October 2003, Humboldt County, the City of Eureka, and the Humboldt Bay Harbor, Conservation, and Recreation District applied for a grant totaling $55,000 to "support efforts to upgrade Highways 299 and 101 to National Highway Network standards." The grant was awarded as of January 1, 2004. Grant monies have funded and disseminated the results of an online survey to assess the impacts to businesses from STAA truck restrictions, publicized the DEIR, conducted outreach advocating for the project, hired Ann Stromberg-Johnson, a former Times Standard journalist, who managed a letter-writing campaign and assisted in the submission of six "My Word" editorials in the Times Standard by business owners supportive of the project (see below), and participated in public hearings and presentations. Lobbying and in-kind staff time are also part of the grant.

The Port

The Harbor District figures prominently in the RG project, although much of the port-related discussions are subsumed for purposes of the RGIP DEIR. In the original Headwater's Fund grant language of October, 2003, "success" of the STAA access project is measured largely in terms of the Buckhorn Grade Improvement Project (BGI) on Highway 299:

"The Port of Humboldt is an asset to our region and the entire West Coast. The BGI project will link the Port of Humboldt to US markets via Route 5 and the Union Pacific national rail network greatly increasing the Port's value."

Traffic

CalTrans and Humboldt County consider Highway 101 the "economic lifeline" of the North Coast (Route 101 Safety and Commerce Study, April 2005).

These highway projects are designed to facilitate interstate and intrastate commerce, yet the CalTrans Draft Environmental Impact Report (DEIR) for the Richardson Grove project provides no evaluation of the socio-economic impacts of such traffic, instead minimizing their likelihood. Clearly, the underlying goal of the Project is to connect up Portland, Medford, Redding, the Bay Area, and other metropolitan areas, with Humboldt and Del Norte Counties. However, the DEIR discounts the impact of the increased traffic through Humboldt County. Another consequence, if not a goal, is to facilitate future development in the rural counties.

Humboldt Bay Harbor District, one of the principals in the Headwaters Grant that funded studies for the Project, has a particular interest in the Buckhorn Summit Project, which could link the Port of Humboldt with a railhead in Redding, and I-5, for containers transported by truck.

In related documents, CalTrans predicts a doubling of international port imports and exports and a 50% increase in domestic port traffic in the next 10 years in California, as California's population increases by 600,000 annually (CalTrans

Strategic Plan 2007-2012).

According to the DEIR, vehicular traffic through Richardson Grove is predicted to grow by 20 percent over the next 20 years, with trucks currently representing 14-17% of total traffic.

The DEIR does not account for the likely increase in truck traffic due to the opened interstate and inter-regional thoroughfare; it actually claims there will be a decrease in truck traffic, because the larger trucks translate into bigger loads per trip. But then they note that most truck traffic into and out of the county transports heavy loads, which reach their weight capacity of 80,000 lbs. before filling the space in most truck trailers, leading CalTrans to conclude that the "Proposed project would not result in significant increases in overall economic productivity in the region." (DEIR 45).

But mostly, CalTrans ignores the through traffic of larger, industry-standard trucks, which would increase pollution and noise and make our surface streets less safe, and fuel growth in Humboldt and Del Norte Counties.

Once the bottlenecks through Richardson Grove and over Buckhorn Summit are breached, it is likely that increased truck traffic will traverse our cities and counties as a direct link to the Bay Area, Portland, and Redding. Currently, that traffic mostly occurs on I-5. These are big, noisy (especially on grade) diesel trucks. Justification for "improving" municipal roadways to accommodate these trucks will surely follow (e.g. Arcata public works proposes widening Foster Ave to accommodate trucks).

In addition, the larger trucks share the same emissions standards with smaller ones, further neutralizing CalTrans' contention that STAA truck passage will reduce traffic and emissions.

The DEIR actually admits that STAA truck limitations are not as important a constraint on commerce here as the lack of 4-lane north-south and east-west highways. In its comments to CalTrans on March 10, 2009, California State Parks personnel warn that this project may be unnecessary in the future if such highways are built (Comment #13).

State Parks goes on to call into question the legal validity of the CalTrans-generated DEIR:

After careful review, the North Coast Redwoods District [of State Parks] has identified several inconsistencies in the DEIR and there is a general lack of date or information that is necessary for our staff to make qualified determinations as to the impact to the State Park resources, and the viability of the mitigation measures that are presented. There are inconsistencies between the CEQA checklist and the Environmental Consequences sections of the DEIR. Several sections of the DEIR are not consistent with CEQA for which we believe additional analysis or mitigation measures need to be developed. The document also contains numerous mitigation measures that are not enforceable and are therefore not compliant with CEQA.

Because of the apparent inconsistencies, lack of clear mitigation methods and a lack of sufficient data to evaluate the proposed project, we are not able to make a determination on some critical aspects of the project's impacts to the State Park. We are concerned that the document does not meet its requirement to be an enforceable environmental tool.

To view the entire State Parks letter, go to: saverichardsongrove.org.

Normally this project would require a parallel bicycle/pedestrian pathway, as mandated under state law, but CalTrans has deferred this to the Park for future implementation.

Economics

In an effort to quantify the economic consequences of the project vs. no project, CalTrans financed the March, 2008 report, “Realigning Highway 101 at Richardson Grove: The Economic Impact on Humboldt and Del Norte Counties,” prepared by Dr. David Gallo from Chico State University. It is based on online surveys (many details of which remain secret from the public) that attempted to quantify the losses and potential benefits associated with STAA truck availability. The surveys were funded, at least in part, by the Headwaters Fund grant approved by the prior Humboldt County Board of Supervisors.

The Gallo report is based on financial data from only 19 respondents in two counties, Humboldt and Del Norte. Surveyed businesses account for only 18.6% of local sales, 9.3% of local employment, and 12.3% of total income earned by residents and businesses of Humboldt and Del Norte counties. Industries in the analysis comprise 15% of total area truck transportation costs, and 26% of non-local truck transportation costs.

The DEIR relies solely on this limited and biased study for its economic arguments, which paradoxically conclude, “The quantitative impact of the STAA truck restriction on Highway 101 at Richardson Grove on industry sales is particularly difficult to estimate...”

Naturally, it is difficult for a business-owner to speak out against the Richardson Grove proposal, a peer pressure problem that further complicates reliable quantification.

Of course, with access to relatively cheap transit, large franchise operations become feasible, and development that includes these entities would appear inevitable. Such development would inevitably eliminate many of our local non-specialized businesses. These likely effects are ignored in the DEIR.

The argument that Big Box stores use their own smaller trucks and therefore are not beneficiaries of the Richardson Grove Project is contradicted by the simultaneous claim that STAA trucks are needed because small trucks are no longer being made.

It is also contradicted by WalMart and Home Depot statements, which are reflected in the Del Norte STAA access plan, which states that “[T]he growth of retail business is similarly impeded. Home Depot opened a store in Crescent City in 2006-along with WalMart... but its trucks must re-load their cargo in Oregon from 70 to 45-foot trailers prior to traveling through Del Norte County.”

In addition to the statistically flawed economic analysis in the DEIR, CalTrans conducts no credible evaluation of the biological or aesthetic influences on the Grove itself, nor on the socio-economic consequences to local residents and businesses directly in the path of the proposed project, which just happen to generate a sizeable fraction of our tourist revenues.

Jobs

As detailed in the March 2009 World Trade Magazine article Box Traffic Blues, West Coast port shipping operations and cargos are shifting towards green, low emissions modalities and products serving renewable energy industries.

Clearly, we would be at a tremendous disadvantage competing with industrial ports close to large metropolitan areas and major rail and highway systems. Trans-shipping containers, autos, or bulk cargo from the Port of Humboldt to Redding, for example, would support a few jobs running mechanized cranes. Likewise, opening of the north-south Highway 101 corridor to large diesel trucks offers few good jobs compared to promising alternatives. Therefore, it makes sense to focus on more appropriate and innovative development that serves our coastal communities.

Alternatives to the Richardson Grove Highway 101 widening project would better support job-producing opportunities in these emerging fields. Since the demand for the development of green technologies for use in marine and port industries is growing rapidly, the Humboldt Bay Harbor, Recreation, and Conservation District could explore the feasibility of developing the dilapidated Redwood Marine Terminal site, or other privately owned facilities, into a Green Port Technologies Industrial Park.

Working with the Schatz Energy Research Center and entrepreneurs coming out of Humboldt State University's new hydrogen curriculum, the facility could provide the infrastructure needed for start-ups. CR could create appropriate technology and industrial training courses for the new jobs being created. The use would complement the business park that is planned for the Samoa Town Development. This type of project could be tailored to attract stimulus funds as well.

This could lead to the introduction of a short sea shipping line based on renewably generated hydrogen-powered tugboats and barges, which would spawn related ship building and recreational class businesses. Other communities are already advancing this paradigm:

“Stockton has begun working with local educational institutions, including high schools, community colleges, and four-year universities, to educate the workforce for the booming renewable energy industry. Fiscalini Farmstead Cheese of Modesto and the Joseph Gallo Farms cheese plant in Atwater generate electricity from methane extracted from their cows’ manure.”2

“At the same time, the ports of LA/LB are introducing electric trucks and other yard equipment that run on cleaner burning fuels. And recently, the world’s first electric-diesel hybrid tugboat was delivered to the ports.”2

Now is the time to devote limited transportation resources to support solutions to transportation and distribution challenges that advance truly sustainable goals and provide a foundation for the jobs of the future.

Safety

Studies of vehicular accidents in Richardson Grove implicate speeding, lack of attention, falling asleep at the wheel, and alcohol in collisions that mostly involve hitting trees, or rear-ending another vehicle. Trucks are involved 16% of the time, reflecting their 16% prevalence among all vehicles.

Although softening the awkward curves through the Grove will improve banking, reduce “off-tracking,” and enhance visibility, it will also likely encourage speeding. And, as pointed out by State Parks in their comments to the Draft EIR, large old growth redwood trees closer to the widened pavement may become more susceptible to collisions (pg 4-5).

Impacts to Richardson Grove Ancient Redwood Forest

Redwood Root Disturbance

Although only two small redwoods will be cut in the Park, along with 27 other trees up to 24 inches in diameter (in addition to 58 trees outside the Park), 30 much larger old growth redwood trees will have their roots disturbed by compaction, cutting, hydrologic change, fill and other consequences of construction activity. Although two of the trees are 18 inches in diameter, the rest are 4 to 15 feet.

CalTrans indicates that the significant roots vulnerable to disturbance are limited to those within the “structural root zone” of the trees, defined as “… the circular area with the tree trunk at the center and a radius equal to 3 times the diameter of the tree trunk measured at breast height (California Department of Parks and Recreation 2005).”

However, redwood trees have no deep tap root, but instead have lateral root systems that extend 4-6 feet deep and 125 feet out from the tree, with a superficial fibrous layer that forms a dense mat in the top 3 feet of soil. These roots interconnect with those of other trees, accounting for the results of an experiment in which labeled water was detected in a tree 500 feet away from the tree where the labeled water originated. (Giants: The Colossal Trees of Pacific North America, by Audrey Grescoe, 1997, pg 21; and Coast Redwood, A Natural and Cultural history, by Michael Barbour, PhD, et al, 2001, pg 25)

In other words, these magnificent giant trees, some 1000-2000 years old and over 300 feet tall, continue to stand by virtue of their shared root systems, which are superficial and exquisitely vulnerable to surface disturbances. CalTrans dismisses these vulnerabilities without reference to any scientific studies. The study they do cite, but without reference to the relevant passages, confirms this vulnerability when it states that, “The root system is composed of deep, wide spreading lateral roots with no taproot.” (Arnold, 40, 44)

Marbled Murrelet Critical Habitat

The probable impacts to the designated critical habitat of the state and federally listed marbled murrelet are entirely dismissed. CalTrans proposes to conduct post-project surveys without any pre-project data (“unknown”). Because the area has been designated as murrelet critical habitat by the California Department of Fish and Game and the U.S. Fish and Wildlife Service, such surveys are mandatory to ensure that no “take,” or killing of protected species occurs. Instead, CalTrans has applied for an Incidental Take Permit, which would immunize the project for liability were the project to harm the listed, and currently declining species.

Without adequate, or any, analysis, proposed mitigations have no context within which to judge their likely effectiveness. Corvid (Jays, crows, ravens)-proof trashcans and shielded lights are hardly reassuring.

Northern Spotted Owl (NSO)

Although NSO critical habitat has not been designated, a Northern Spotted Owl nest is located one half mile away from the project. NSOs forage in open areas of the forest for wood rats and other small mammals. They are declining throughout their range.

Other Threatened and Endangered Species

Steelhead, Coho, and Chinook salmonids use Dunphy Creek, and the South Fork Eel River, both of which run through Richardson Grove State Park. Fishers and Bald Eagles live in Richardson Grove, along with their prey. California State Parks Foundation, in its 13-page letter to CalTrans of 3/12/09, cited numerous potential impacts to protected species in Richardson Grove, many of which State Parks believes are inadequately addressed in the DEIR.

Manipulated Media

CalTrans' District Director Charlie Fielder, who oversees the Richardson Grove project, published an opinion article in the local papers on March 18, just six days after the close of public comment on the DEIR. Fielder assured the public that this project had a green light, and that it would be carefully monitored to ensure that harm to the environment and Grove would be minimized.

It is not surprising that CalTrans would declare victory before even responding to public comments on the DEIR, since the agency initially proposed to do the widening without any significant public review. (CalTrans only agreed to create a DEIR, instead of its preferred and much less scrutinizing "Negative Declaration," after significant public pressure.) But one must ask, how can the agency assume its activities will be harmless without analyzing the potential for harm in the first place? That is, CalTrans betrays no understanding — at least none to be found in the DEIR — of the impacts associated with redwood root disturbances, among several other acute environmental concerns. And Mr. Fielder dismisses concerns over Big Box-type growth with the cavalier assertion that this project is not being done for those stores.

Mr. Fielder's "My Word" opinion article was the sixth to appear in the Eureka Times-Standard in support of the Richardson Grove project. They are all, apparently, connected: to each other, and to the 5 letters written to the editor in support of the Project. Although un-attributed, this PR campaign, which is designed to show broad business and public support for an inevitable and benevolent Project, is actually a choreographed effort funded by the Headwaters Fund and orchestrated by the Humboldt County Department of Economic Development 101 Access Project.

The Grant update of 3/09 states that a contractor (Ann Johnson-Stromberg) was hired to "manage a letter-writing campaign," and that they had "[A]ssisted in the submission of approximately six "My Word" editorials in support of Richardson Grove Project, written by business owners affected by the restrictions." Use of Headwaters fund money to sway public opinion for a very controversial and consequential undertaking, without acknowledging that the letters are in some ways advertising paid for by tax dollars, is deceptive, manipulative and unethical. The strategy is to depict this Project as trivial, inconsequential, and inevitable, benefiting local businesses without any growth-inducing potential.

It is this pervasive fait accompli attitude that resulted in a DEIR which drew this criticism from attorneys representing the Environmental Protection Information Center:

"The existing balance within Richardson Grove is fundamental to maintaining one of the most extraordinary places, not only within California, but on Earth. CalTrans must undertake any modification to this balance with the utmost caution. This DEIR appears instead to offer a hastily assembled series of justifications for a decision already made. Such a process makes a mockery of the commitments that the people of California made in CEQA, and the people of the United States in NEPA, to ensuring that public agencies take a 'hard look' at decisions with potentially significant environmental impacts."

Alternatives

Clearly, we must ask: do we need this project? Is it worth the unexamined impacts to the Grove, to traffic patterns in the County, and to local businesses? What desirable alternatives are available, or perhaps even more important, what potential alternatives will be precluded by CalTrans' project? Can we accommodate business' needs, as well as non-motorized vehicle capacity (which is not part of this project) with slower speeds, and judicious waivers from the length restriction, while developing alternatives that are compatible with our rural lifestyle and protect our environment?

California State Park Foundation stated:

"Based on the environmental documentation provided, CSPF does not believe this [Richardson Grove] proposal can proceed without violating one of the nation's strongest environmental laws – Section 4(f) of the Department of

Transportation Act. Section 4(f) plainly bars the use of parklands for transportation projects absent exceptional circumstances, and such circumstances have not been demonstrated for the Project…A thorough analysis of significant environmental impacts is still needed; a full discussion of alternatives has yet to be performed, and mitigation measures are insufficient and often unenforceable."

The President of the local Cattlemen's Association, Jorie Brundy, observed:

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

Given the ever-accelerating pace of technological innovation and entrepreneurial opportunity, preferable alternatives could be right around the corner, so why rush into a project whose effects are inadequately evaluated, potentially catastrophic, undoubtedly permanent, and in the absence of which we might do something far more beneficial?

California leads the nation in regulating and decreasing greenhouse gas emissions, 98% of which come from burning fossil fuels. 40% of the human-related emissions derive from transportation. In this time of critical climate change, non-fossil fueled transport alternatives are one of the federal government's primary goals for stimulus funding. Short-sea shipping, powered by locally generated, non-fossil fuels, is an appealing, fundable option for coastal communities.

Richardson Grove, A Spiritual Heritage

The Indian people of the Intertribal Sinkyone Council considers Richardson Grove home to their spiritual ancestors, and this project as a desecration of that heritage.

Richardson Grove is a Memorial to Fallen WWI Heroes

We close with this poignant reflection: Humboldt Redwoods State Park is home to a memorial grove established in honor of Colonel Raynal C. Bolling, commemorating the first American Army officer of high rank to fall in World War I, a lawyer and father of four who laid the foundation for the U. S. Military Aviation Service.

Bolling Grove reminds us of his wisdom:
"Let's look inside and remember that it's our ideals, our endeavors, our affections and love that are the realities in Life." -- Raynal Bolling

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Save Richardson Grove:

saverichardsongrove.org

Save Richardson Grove blog:

www.saverichardsongrove.blogspot.com

Earth First! Humboldt:

efhumboldt.org

STAA Truck Routes:

http://www.sacdot.com/services/STAA_Truck_Routes.asp

Office of Truck Services (CalTrans, or CalTrance), serving its master – industry -- first:

http://www.dot.ca.gov/hq/traffops/trucks/

Sail Transport Network:

sailtransportnetwork.org

Stop "America's Greenest City" from Paving Wetland:

culturechange.org

Open letter to Arcata destroying wetland for oil consumption::

culturechange.org