

**DEPARTMENT OF TRANSPORTATION**

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7/31/2020

Governor's Office of Planning & Research

**Jul 30 2020**

**STATE CLEARINGHOUSE**

July 29, 2020

Dusty Duley  
Community Development Director  
City of Willits  
111 East Commercial Street  
Willits, CA 95490

1-MEN-20-32.889  
Willits Unified SD GPA and Rezone  
SCH# 202007003

Dear Mr. Duley:

Thank you for the opportunity to comment on the proposed General Plan Amendment and Rezone of approximately 5.68-acres in the City of Willits. The properties are currently vacant and are designated "Industrial General" under the General Plan and "Heavy Industrial" under the zoning ordinance. The project proposes to amend the General Plan designation to "Residential Medium Density" (R-M) and rezone the parcels to "Residential Medium Density" (R2).

The rezone comes in preparation for development of a future conforming multi-family residential development application. A Traffic Impact Study (TIS) assesses potential impacts associated with the increased traffic a residential development could generate, compared to an industrial complex. An analysis was performed assuming a maximum of 165 multi-family units for future potential development. There is not currently a specific development proposal.

Although the proposal is not adjacent to the state highway system, it will impact State Route 20 and South Main Street. The proposed project site is located to the east of Locust Street near the intersection of Walnut Street (1-MEN-20-32.889). We have the following comments as this project moves forward:

**Senate Bill 743:**

Senate Bill 743 (SB 743) was approved in 2013 and incorporated into the State's CEQA Guidelines in 2018, and better aligned CEQA with the State's climate goals. CEQA now considers overall automobile use as the primary transportation impact. The change in how CEQA considers transportation impacts aims to reduce automobile trips while increasing the use of more sustainable modes that are essential to supporting California's growing population and economy, also while meeting climate goals.

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Because criteria for determining the significance of transportation impacts must promote, "the development of multi-modal transportation networks," project impacts to bicycle networks, pedestrian networks, and transit systems must be considered (pursuant to Public Resources Code, section 21099, subdivision (b)(1)).

The Traffic Impact Study (TIS) for this project (W-Trans, May 14, 2020) uses traditional Level of Service (LOS) and delay metrics that are no longer accepted for consideration on the state highway system. New metrics have been set for identifying and mitigating transportation projects within CEQA. However, the City of Willits may still require mitigation for LOS on local streets.

The TIS should be revised to meet, or exceed, the minimum provided in the new Caltrans guidance, "Vehicle Miles Traveled Focused Transportation Impact Study Guide." This document can be found on our website at: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

Revisions to the TIS should include (but are not limited to) the following:

**Revisions to the TIS:**

1. The Study should be renamed from "Traffic Impact Study" to "Transportation Impact Study".
2. The Study should include a Vehicle Miles Traveled (VMT) analysis that is consistent with the guidance from Caltrans and the Mendocino Council of Governments (MCOG), which evaluates the per capita VMT relative to the VMT level of significance recently established by Mendocino County.
  - Please refer to the *Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study (May 20, 2020)* and the *SB 743 VMT Screening Tool* prepared for MCOG.
3. The Study should include an evaluation of on-site and off-site improvements with the following goals:
  - a. Reduce single occupancy vehicles;
  - b. Reduce per capita VMT;
  - c. Reduce greenhouse gas (GHG) emissions;
  - d. Increase accessibility to destinations via cycling, walking, carpooling, and transit;
  - e. Provide a safe transportation system, including safer connections between new development and the existing community, and reduced impacts to multi-modal access or conflicts between modes.

4. The Study should include an analysis of the intersection of South Main Street with Walnut Street. The analysis should consider improvements to:
  - a. Reduce the presently occurring, illegal left-hand turn movements from Walnut Street onto South Main Street. These movements are likely to increase with additional trips generated by the proposed project. This may create conflicts with railroad operations and conflicts with through traffic on South Main Street;
  - b. Facilitate pedestrian crossing to access the existing Mendocino Transit Authority (MTA) Safeway stop along northbound South Main Street;
  - c. Evaluate all applicable signal warrants, including 4-hour, 8-hour, peak hour, pedestrian, and at-grade.
    - i. These intersection analyses must consider effects of queuing and blocking from the State Route 20/South Main Street intersection that has currently been observed to extend past the South Main Street/Walnut Street intersection.
    - ii. An intersection Control Evaluation (ICE) is required if proposed changes to the existing intersection(s) include the addition, expansion, or full control of the intersection(s). A "full control" involves the use of a signal, stop, or yield control on each of the through and most major movements.
5. The Study should document the source data used for existing volumes. Any volume data used in the TIS analyses must reflect normative conditions. Any data from atypical time periods (i.e. utility/safety power shut-offs, Covid-19 shelter-in-place orders, etc.) must be adjusted to reflect normative conditions or be excluded.
6. The Study should include a Safe Routes to School analysis between the project and nearby local schools.

**Recommendations:**

1. We recommend giving consideration to converting the proposed Walnut Street extension from a road to a multi-use pathway to prevent local vehicular traffic from using the school parking lot as a through road.
2. SB 743 encourages high-density, infill projects that include transit-oriented development and promote active transportation. Caltrans recommends implementing off-site improvements into the project to provide bicycle access and ADA-compliant pedestrian connectivity to nearby transit stops and local goods and services.

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We look forward to working with the City of Willits as this project moves forward. Please feel free to contact me with any questions about the comments outlined in this letter or for further assistance: [tatiana.ahlstrand@dot.ca.gov](mailto:tatiana.ahlstrand@dot.ca.gov).

Sincerely,

*Tatiana Ahlstrand*

TATIANA AHLSTRAND  
Associate Transportation Planner

CC: State Clearinghouse