

## California Department of Transportation

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April 4, 2022

1-MEN-101-40.8  
Golden Rule Church Association  
SCH# 2022030143

Ms. Susan Summerford  
Department of Planning and Building Services  
County of Mendocino  
860 N. Bush Street  
Ukiah, CA 95482

**Governor's Office of Planning & Research**

**Apr 05 2022**

**STATE CLEARINGHOUSE**

Dear Ms. Summerford:

Thank you for giving Caltrans the opportunity to review and comment on the request for a Minor Use Permit for the conversion of an existing single story, 30-room motel into a 21-unit apartment complex. The units are proposed to consist of nine (9) studios, ten (10) 1-bedroom, and two (2) 2-bedroom apartments. The project is located approximately 5.8 miles south of the Willits city center, lying on the west side of U.S. Route 101 and immediately north of its intersection with Black Bart Drive (CR 370); located at 16580 N Highway 101, Willits. We have the following comments:

The Draft Negative Declaration for the document for the project makes the following finding for transportation-related impacts: *While the project would contribute incrementally to traffic volumes on local and regional roadways, the Site is located 'within a halfmile of an existing high quality transit corridor' (Highway 101) as required by CEQA Guidelines section 15064.3, subdivision (b). The conversion proposed is not expected to significantly impact the capacity of the street system, level of service standards established by the County, or the overall effectiveness of the circulation system, nor substantially impact alternative transportation facilities, such as transit, bicycle, or pedestrian facilities, as a substantial increase in traffic trips or use of alternative transportation facilities is not anticipated. No impact would occur.*

Please note that a bus stop does not meet the legal definition of a "high-quality transit corridor." Rather, California Code, Public Resources Code (PRC) § 21155 defines a high-quality transit corridor as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. We are not aware of any transit service routes in Mendocino County operating with 15-minute headways and, therefore, we do not concur with the County's finding.

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We do recognize that in rural areas, fewer multi-modal options exist and that some flexibility with the new VMT standards can be considered. The presence of regularly scheduled transit service, operating at one-hour intervals at least five days a week with limited weekend service, may be an indicator that alternative modes of travel may offer alternatives to single-occupancy vehicles. In such cases, the project should establish that the proposed project has the potential to decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. It does not appear that, based on the location of the proposed project, it is possible to make such a finding.

Please consider whether or not the project has the potential to be screened out of further VMT analysis using the map-based screening tool developed for Mendocino County by the Mendocino Council of Governments (MCOG). Failing this possibility, please consider requiring VMT mitigation as a condition of project approval.

Further information about VMT screening and mitigation can be found on the MCOG website at the following address:

<<https://www.mendocinocog.org/vehicle-miles-traveled-vmt-regional-baseline-study-completed>>.

Please contact me with questions or for further assistance with the comments provided at (707) 684-6879 or by email at: <[jesse.robertson@dot.ca.gov](mailto:jesse.robertson@dot.ca.gov)>.

Sincerely,

Jesse Robertson  
Transportation Planning  
Caltrans District 1

e-copy: Nephele Barrett, Director, Mendocino Council of Governments