

California Department of Transportation

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April 10, 2023

1-MEN-Willits-General
Land Use & Sphere of Influence NOP
SCH# 2023030321

Mr. Dusty Duley, Director
Community Development Department
City of Willits
111 E. Commercial Street
Willits, CA 95490

Dear Mr. Duley:

Thank you for giving Caltrans the opportunity to comment on the Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (Program EIR) for the City of Willits Land Use and Sphere of Influence Update. The City will evaluate the environmental effects associated with the proposed General Plan Land Use Element and Sphere of Influence (SOI) Updates. The Program EIR will address the environmental impacts associated with the adoption and implementation of the proposed project and the zoning amendments necessary to implement the General Plan as well as planning for an expansion of the City of Willits SOI. We have the following comments:

Caltrans encourages the City to consider the need for transportation infrastructure and future road network expansion with the proposed changes in land use and in the siting of proposed housing opportunity zones. We recommend that that the plan updates consider the connectivity of these new zones to the community's existing services, retail, employment, etc., from the perspective of the bicyclist and the pedestrian who will come to live in these zones.

When streamlining the housing approval process be sure to consider special roadblocks which may exist for infill or redevelopment proposals, which can make them less attractive to build than greenfield (vacant or raw land) development. Infill development is typically located closer to existing services, which can result in lower numbers of Vehicle Miles Traveled (VMT) generated by development, thereby lowering transportation impacts under CEQA. Infill is also generally regarded to require less investment in new infrastructure, e.g. utility lines and roads, than will greenfield development. Ideally, new policies should streamline infill development to make it as simple and inexpensive to approve as greenfield development.

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By planning for land uses that generate fewer Vehicle Miles Traveled per capita, fewer Greenhouse Gas emissions will be produced from transportation sources. For the City's benefit, we have included a link to the California Air Pollution Control Officers Association (CAPCOA)'s "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity." Chapter 3 contains a section on land use and neighborhood design measures that reduce Greenhouse Gas emissions from transportation sources. We request that Willits consider incorporating as many measures as is feasible into the Land Use and Sphere of Influence updates:
<https://www.caleemod.com/documents/handbook/full_handbook.pdf>.

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

Sincerely,

Jesse G. Robertson

Jesse Robertson
Transportation Planning
Caltrans District 1

c: State Clearinghouse