Appendix O Comment Letters and Responses

This page is intentionally left blank.

Albion River Bridge Project

MENDOCINO COUNTY, CALIFORNIA
District 1 – MEN – State Route 1 (PM 43.3/44.2)
EA 01-40110 / Project ID 0100000154

Comments and Response to Comments

This page is intentionally left blank.

Table of Contents

Chapter 1. Introduction 1
1.1 Comments Received on the DED 1
1.2 Organization of Public Comments 1
1.3 Index of Commentors 1
1.4 Formatting of Responses to Comments 6
1.5 Responses to Comments under NEPA and CEQA 6
1.6 Rehabilitation vs Preservation 7
Chapter 2. General Comments/Master Responses 9
►Topic 1: Rehabilitation 9
►Topic 2: Construction Duration 10
►Topic 3: Coastal Act Policies 10
►Topic 4: New Public Access 11
►Topic 5: Public Access During Construction 12
►Topic 6: Local Economy 12
►Topic 7: Traffic and Emergency Response 13
►Topic 8: Hydrology and Floodplain 14
►Topic 9: Air Quality 14
►Topic 10: Noise 15
►Topic 11: Energy 15
►Topic 12: Vehicle Miles Traveled 16
►Topic 13: Environment 16
Chapter 3. Federal, State, and Local Agency Comments 19
3.1 California Department of Fish and Wildlife Service 20
3.2 Department of the Interior 42
3.3 Elk Volunteer Fire Department 45
3.4 North Coast Regional Water Quality Control Board 47
3.5 State Lands Commission 51
3.6 U.S. Environmental Protection Agency 59
3.7 Advisory Council on Historic Preservation 62
Chapter 4. Organization, Business, and Other Group Comments 65
4.1 Albion Bridge Stewards 66

4.2 Albion Bridge Stewards 2 143
4.3 Albion Bridge Stewards 3 152
4.4 Albion Bridge Stewards Petition 164
4.5 Amphibian Refuge 185
4.6 California Native Plant Society – Dorothy King Young Chapter 188
4.7 Center for Biological Diversity 197
4.8 Jocelyn Seto Carter, Albion River Campground 200
4.9 Keep Big Sur Wild 205
4.10 Mary Bobbitt and Jul Niemier, Tides Turn Vacation Home 215
4.11 Sierra Club 1 219
4.12 Sierra Club 2 232
4.13 Zia Cattalini, Friends of Enchanted Meadow 236
Chapter 5. Individual Comments 239
5.1 Alan Stein 240
5.2 Alex de Grassi 243
5.3 Alison de Grassi 246
5.4 Alison Gardner 248
5.5 Aloura Harrold 252
5.6 Ann Zollinger 255
5.7 Annemarie Weibel 257
5.8 Anthony Gatchalian and Alon Fish 282
5.9 Anthony Wade 284
5.10 Beth Perrill 287
5.11 Bill Schieve 290
5.12 Brad Harris 292
5.13 Bruce Laks 294
5.14 Carmen Goodyear 296
5.15 Carol Clary 298
5.16 Charles Artigues 300
5.17 Charles Lang 302
5.18 Dan Gates 304
5.19 David Steinrueck 306
5.20 David Wylie 309
5.21 Debra Doeringt 312

5.22 Dennis Lander 316
5.23 Dobby Sommer 318
5.24 Dobie Dolphin 320
5.25 Dot Brovarney 325
5.26 Doug Wilson 327
5.27 Elizabeth Canady 329
5.28 Esther Faber 331
5.29 Frank Hartzell 334
5.30 Gabrielle Levine 342
5.31 Ginetta L. Giovinco 344
5.32 Gisele Darcy 352
5.33 Greg Yarman 354
5.34 Gregory Ross 356
5.35 Ingrid Noyes 358
5.36 Jacob Patterson 360
5.37 Jan DeSipio 362
5.38 Janet Eklund 364
5.39 Jeanette Rasker 372
5.40 Jeremy Isenberg 375
5.41 Jerry 377
5.42 Jerry Oglesby 379
5.43 Jim Heid 381
5.44 Jo Bradley 390
5.45 Joel Ginsberg 392
5.46 John Danhakl 394
5.47 John Johansen 404
5.48 Josefina Perla 416
5.49 Julie Rumble 418
5.50 Karen Chambers 422
5.51 Kat Monteiro 424
5.52 Kathy Wylie 426
5.53 Kim Obermeyer 428
5.54 Krista Eiber 430
5.55 L.A. Hyder 432

5.56 Lauren Knapp 434
5.57 Lawrence Turner 436
5.58 Leona Walden 438
5.59 Lisa Weg 440
5.60 Liz Helenchild 442
5.61 Louis Sciocchetti and Rebecca McLean 444
5.62 Marcus McCallen 447
5.63 Mark Edwards 449
5.64 Matt Gouig 451
5.65 Megan and Joe Skorupa 454
5.66 Michael Issel 456
5.67 Miranda Edison 458
5.68 Mitchell Clogg 460
5.69 Muin Daly 462
5.70 Nancy Chao 464
5.71 Nita Tahlequah Ishcomer 467
5.72 Osha Dean 469
5.73 Penny Erwin 471
5.74 Peter Temple 473
5.75 Phil Massam 475
5.76 Prabhleen Singh 477
5.77 Richard 479
5.78 Rick Childs 481
5.79 Robert Jamgochian 484
5.80 Roger and Georgia Collin 486
5.81 Ronald Karish 501
5.82 Sharon L. PetrosinoWilson 503
5.83 Sharon Meyer 506
5.84 Stephen Barlow 508
5.85 Susan Waterfall 510
5.86 Spirit 512
5.87 Tammy and Gladys Bransford 514
5.88 Tom Wodetzki 519
5.89 Wendy Meyer 521

5.90 Winston Bowen 523
Chapter 6. Template Letter Comments 525
6.1 Introduction 526
6.2 Template Comments and Responses 527
6.2.1 Air Quality 527
6.2.3 Business Impact 529
6.2.4 Community Impacts 530
6.2.6 Environmental Disruption 537
6.2.7 Hydraulic and Floodplain Impact 538
6.2.8 Noise Impact 539
6.2.9 Daily Commute Disruptions 540
6.2.10 Traffic Disruption 541
6.3 Other 543
Chapter 7. Miscellaneous Public Hearing Handouts 545
7.1 Introduction 546

This page is intentionally left blank.

Chapter 1. Introduction

The California Department of Transportation (Caltrans) prepared a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Albion River Bridge Project, which circulated for public review between July 8, 2024, and October 9, 2024. Two public meetings were held during this period—an in-person hearing in Albion on August 13, 2024, and a virtual meeting on September 26, 2024.This document contains the written comments received on the Draft EIR/EIS during the public review period, and responses to those comments.

1.1 COMMENTS RECEIVED ON THE DED

More than 200 comments in the form of comment cards, emails, letters, and template emails were received from agencies, organizations, businesses, groups, and individuals during the public comment period. Some individuals and groups submitted more than one written comment.

1.2 ORGANIZATION OF PUBLIC COMMENTS

Each public comment that was received on the project was placed into one of the following categories, and are addressed in the following order within this document:

1. Federal, State, and Local Agencies (Chapter 3)
2. Organizations, Businesses, and Other Groups (Chapter 4)
3. Individuals (Chapter 5)
4. Template letters (Chapter 6)

Each written comment is included in this document with individual responses or references to master responses, which are discussed in Chapter 2, *General Comments/Master Responses,* of this document.

1.3 INDEX OF COMMENTORS

The following table shows all those who commented on the Draft EIR/EIS, and in which section(s) of this document the response to the comment is located. All who commented on the Draft EIR/EIS will be provided a notice of availability of the final environmental document.

Name(s)	Section(s)	Name(s)	Section(s)
Advisory Council on Historic Preservation (ACHP)	3.7	Josefina Perla	5.48, 6.2.9
Alan Stein	5.1	Julie Drucker	6.2.2, 6.2.3, 6.3.4, 6.2.6, 6.2.8

Name(s)	Section(s)	Name(s)	Section(s)
Albion Bridge Stewards	4.1, 4.2, 4.3, 4.4	Julie Rumble	5.49
Alex de Grassi	5.2	Karen Chambers	5.50
Alexandra Allman-Van Zee	6.2.4	Karen Lewis	6.2.4, 6.2.6
Alice Einhorn	6.2.8	Karen Rakofsky	6.2.6
Alison de Grassi	5.3	Karl Schoen	6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.10
Alison Gardner	5.4	Kat Hanlon	6.2.4
Aloura Harrold	5.5	Kat Monteiro	5.51
Amanda De Smidt	6.2.4	Kathy Wylie	5.52
Amphibian Refuge	4.5	Keep Big Sur Wild	4.9
Anita Bedenis	6.2.4	Kelly Steinrueck	6.2.7
Ann Zollinger	5.6	Kim Obermeyer	5.53
Anne Eaton-Kemp	6.2.4	Krista Eiber	5.54
Annemarie Weibel	5.7	Kristin Otwell	6.2.10
Annie Lee	6.2.6	Kymberly Ainsworth	6.2.10
Anthony Gatchalian and Alon Fish	5.8	L. A. Hyder	5.55
Anthony Wade	5.9	Larry Miller	6.2.4
Arlene Reiss	6.2.4	Laura Scott	6.2.2, 6.2.5, 6.2.8, 6.2.9, 6.2.10
Barbara Faulkner	6.2.10	Lauren Knapp	5.56
Beth Perrill	5.10	Laurie York	6.2.4
Bill Cornelius	6.2.4	Lawrence Turner	5.57
Bill Schieve	5.11	Leona Walden	5.58
Bonnie Bills	6.2.4	Leslie Hubbert	6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.10
Brad Harris	5.12	Lisa D Walker	6.2.4
Brian and Gretchen Paddock	6.2.4	Lisa Weg	5.59
Bruce Blondin	6.2.5	Liz Helenchild	5.60
Bruce Laks	5.13	Louis Sciocchetti & Rebecca McLean	5.61
California Department of Fish and Wildlife (CDFW)	3.1	Lynn Learned Sims	6.2.10
California Native Plant Society	4.6	Lynn Louderback	6.2.2, 6.2.4
Carmen Goodyear	5.14, 6.2.2, 6.2.10	Lynne Paschal	6.2.4
Carol Clary	5.15	Marci Eversole	6.2.4

Name(s)	Section(s)	Name(s)	Section(s)
Carrie Durkee	6.2.5	Marcus McCallen	5.62
Center for Biological Diversity	4.7	Margaret Pickens	6.2.4, 6.2.10
Charles Artigues	5.16	Margot Lieberman	6.2.6
Charles Lang	5.17	Marilyn Magoffin	6.2.6
Cherie Christiansen	6.2.4	Mark Edwards	5.63
Cheryl Bloom	6.2.7	Mary Bobbitt and Jul Niemier, Tides Turn Vacation Home	4.10
Chris Bolei	6.2.4	Mary Heinrich	6.2.6
Chris Larsen	6.2.4	Mary Hooper	6.2.1, 6.2.2, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.10
Christene Berchen	6.2.4, 6.2.10	Marya Vohryzek-Griest	6.2.6
Christopher Steinrueck	6.2.4	Mat Gouig	5.64
Cynthia Johnson	6.2.10	Megan and Joe Skorupa	5.65
Dale Canyon	6.2.4	Melissa Hays	6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10
Dan Gates	5.18	Merry Winslow	6.2.7
David Spampanato	6.2.4	Michael Coad	6.2.4
David Steinrueck	5.19	Michael Hubbert	6.2.6
David Wylie	5.20	Michael Issel	5.66
Debra Doeringt	5.21	Michael Ward Seeler	6.2.9
Denise Doering and Robert Hudson	6.2.4	Miranda Edison	5.67, 6.2.4
Dennis Lander	5.22	Mitchell Clogg	5.68
Department of the Interior (DOI)	3.2	Muin Daly	5.69
Diane Buxton	6.2.4, 6.2.6	Myra Beals	6.2.5, 6.2.6, 6.2.10
Diane Clouse	6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.10	Nancy Chao	5.70, 6.2.3, 6.2.4, 6.2.6
Diane Ogle	6.2.6	Nancy Reynolds	6.2.4
Dianne Tobias	6.2.3	Nita Tahlequah Ishcomer	5.71
Dobby Sommer	5.23, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.9, 6.2.10	Norma Leah Andres	6.2.4

Name(s)	Section(s)	Name(s)	Section(s)
Dobie Dolphin	5.24	North Coast Regional Water Quality Control Board (NCRWQCB)	3.4
Donna Farmer	6.2.2, 6.2.4, 6.2.6	Osha Dean	5.72
Dorie and David Rivers	6.2.4	P A Asher	6.2.6
Dot Brovarney	5.25	Patricia Scott	6.2.4
Doug Wilson	5.26	Penny Erwin	5.73
Elan Stopnitzky	6.2.2	Pete Kalvass	6.2.4, 6.2.10
Eleanor Cooney	6.2.4	Peter Temple	5.74
Elizabeth Canady	5.27, 6.2.2, 6.2.4, 6.2.8, 6.2.10	Phil Massam	5.75
Elk Volunteer Fire Department	3.3	Prabhleen Singh	5.76
Ellen Athens	6.2.1, 6.2.4, 6.2.5, 6.2.8, 6.2.10	Priscilla and Larry Krasner	6.2.10
Ellen Saxe	6.2.4	Rachel Ganapoler	6.2.4
Erica Fielder	6.2.4	Ray Duff	6.2.10
Erif Thunen	6.2.9	Rhoda Teplow	6.2.10
Esther Faber	5.28	Richard	5.77, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.7, 6.2.8, 6.2.10
Felicia Rice	6.2.4, 6.2.6, 6.2.7	Ricia Araiza	6.2.10
Fern Kruger	6.2.4	Rick Childs	5.78, 6.2.6
FFT	6.2.2	Rick Hemmings	6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10
Flora Greenberg	6.2.10	Rita Crane	6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.7, 6.2.8, 6.2.9, 6.2.10
Frank Hartzell	5.29	Robert Jamgochian	5.79
Frank Letton	6.2.6	Roger and Georgia Collin	5.80
Franz Arner	6.2.6	Rona L Peckich	6.2.4
Gabe De Smidt	6.2.10	Ronald Karish	5.81
Gabrielle Levine	5.30	Rosalie Anchordoguy	6.2.4
Gary Ratway	6.2.4, 6.2.9	Rosemary Jacobs	6.2.4
Geoffrey Baugher	6.2.6	Sally	6.2.6
Ginetta L. Giovinco	5.31	Sam Gitchel	6.2.4

Name(s)	Section(s)	Name(s)	Section(s)
Ginny Stearns	6.2.4	Sara Fowler	6.2.4
Gisele Darcy	5.32	Sarah Lastition	6.2.6
Glyn Rixon	6.2.2	Sharon PetrosinoWilson	5.82
Grant Lineham	6.2.10	Sharon Meyer	5.83
Greg Yarman	5.33	Sheila Jenkins	6.2.6
Gregory Ross	5.34	Shelley Martin	6.2.8
Gretchen Schubeck	6.2.10	Sidra Stone	6.2.10
Hannah-Leigh Bull	6.2.5	Sierra Club	4.11, 4.12
Harriet Bye	6.2.3	Spirit	5.86, 6.2.8
Havana Davidson	6.2.9	Stan Thornton	6.2.4, 6.2.10
Helen Jacobs	6.2.6	State Lands Commission (SLC)	3.5
Hilary Eddy	6.2.4	Stephen Barlow	5.84
Ilana Williams	6.2.4	Susan Larkin	6.2.10
Ingrid Noyes	5.35	Susan Maeder	6.2.2
Jacob Patterson	5.36	Susan Nutter	6.2.10
James Holden	6.2.6	Susan Waterfall	5.85, 6.2.4
James Roberts	6.2.9	Suzanne Miller	6.2.6
Jan DeSipio	5.37	Tammy Bransford and Gladys Bransford	5.87
Janet Eklund	5.38	Terry Simcik	6.2.10
Janferie Stone	6.2.7, 6.2.9	Thomas Herz	6.2.4
Jeannette Rasker	5.39	Toby Malina	6.2.6
Jeff S Taylor	6.2.6	Tom Wodetzki	5.88
Jenny Harrison	6.2.2	U.S. Environmental Protection Agency (U.S. EPA)	3.6
Jeremy Isenberg	5.40	Vince Taylor	6.2.4
Jerry	5.41	Virginia Sharkey	6.2.4
Jerry Brown	6.2.4	Warren De Smidt	6.2.5
Jerry Oglesby	5.42	Wendy Meyer	5.89
Jim Heid	5.43	Windy and Grant Lineham	6.2.4
Jo Bradley	5.44	Winston Bowen	5.90
Joan Burleigh	6.2.10	Woodson Thornton	6.2.5, 6.2.6
Jocelyn Seto Carter, Albion River Campground	4.8	Yaniv Stopnitzky	6.2.2
Joel Ginsberg	5.45	Zattu Kadan	6.2.4
John Danhakl	5.46	Zia Cattalini, Friends of Enchanted Meadow	4.13
John Johansen	5.47		

1.4 FORMATTING OF RESPONSES TO COMMENTS

As mentioned previously, numerous written comments were received on the Draft EIR/EIS. These comments are provided in their entirety in the following chapters unless otherwise noted. Caltrans' responses are provided following each written comment. Comments that included more than one topic or point were broken into sections, which are indicated by numbered boxes. These numbered boxes are adjacent to the beginning of the comment and contain all text to the following comment or the end of the written text. These numbers correspond with the responses provided at the end of the comment letter. Introductory text, summaries of the project description, laws and regulations, and similar text were not considered comments that warranted a response. See Section 1.5 below for state and federal requirements for responses to comments.

Many of the comments received were on similar topics and raised similar concerns regarding the proposed project. To avoid repetition, common issues were grouped together by topic and are identified as "general comments", and responses were prepared to address each topic and are identified as "master responses". These general comments and master responses are provided in Chapter 2.

1.5 RESPONSES TO COMMENTS UNDER NEPA AND CEQA

Under NEPA and CEQA, a written response must be provided for substantive comments (40 CFR 1503.4(a); CEQA Guidelines 15088). Substantive comments are those comments that are related to the facts of the project, environmental document, or studies—comments that are purely expressing support or opposition to the project or expressing an opinion without any factual substantiation may be acknowledged but do not generally require a response. The level of detail provided in response to a comment may correspond with the level of detail provided in the comment (i.e., responses to general comments may be general) (CEQA Guidelines 15088(b); Council on Environmental Quality 2012[1]).

Further, under CEQA, determining whether a project has a significant effect is "based on substantial evidence in light of the whole record" (CEQA Guidelines 21082.2(a)). Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts; substantial evidence means that a fair argument can be made to support a conclusion, based on the whole of the record, even though other conclusions might also be reached (CEQA Guidelines 15384). Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence. In addition, while impacts that are too speculative should be noted, further review is not necessary (CEQA Guidelines 15145).

[1] Council on Environmental Quality (CEQ). (2012). Improving the Process for Preparing Efficient and Timely Environmental Reviews under NEPA.

Responses to substantive comments may include modifications of project design, supplementing, improving, or modifying the analysis in the final document, making factual corrections, or explaining why comments do not require modification to the document and/or proposed projects. Changes to the text of the final environmental document are marked with a line in the margins of the document and the responses to comments include a reference to the document change.

1.6 REHABILITATION VS PRESERVATION

Several comment letters use the term “preservation”. Per the Federal Highway Administration (FHWA), rehabilitation is one of two preservation activities, the other being preventative maintenance. For the purposes of responding to comments and given the condition of the existing bridge, Caltrans assumes “preservation” is intended to mean “rehabilitation”.

This page is intentionally left blank.

Chapter 2. General Comments/Master Responses

Many of the written comments received from the public raised similar concerns regarding the proposed project. To avoid repetition of responses to similar comments, common issues raised in public comments were grouped together by topic and paraphrased, and master responses were provided.

►Topic 1: Rehabilitation

General Comment: *Rehabilitation of the existing bridge would have a smaller footprint compared to construction of a new bridge and would use less resources. There would be less impacts to air quality, biological resources, energy use, hydrology, noise, traffic, etc. Rehabilitating the existing bridge would enhance the cultural heritage of the area, and honor's the bridge's cultural significance.*

Master Response 1:

Potential impacts identified in the comment letters associated with rehabilitation are speculative and without substantiation (see Section 1.5 above). Rehabilitation of the existing bridge would involve similar temporary construction elements as the Build Alternatives under consideration, including access roads and staging areas, tree and vegetation removal, temporary work trestles, traffic closures, and public access restrictions to the Albion Beach and Albion Campground. For example, like the Build Alternatives, rehabilitation would also include traffic impacts. Initial estimates revealed that rehabilitation would require an estimated 100 days of extended nighttime closures in addition to a 55-hour bridge closure to facilitate replacement of the steel truss, as compared to the Build Alternatives which only propose one extended nighttime closure and no 55-hour closure.

Rehabilitation of the existing bridge would also result in the loss of character defining features of the bridge and would affect its historic integrity. The bridge is listed under Criterion A (historic significance) and Criterion C (architectural significance) of the National Register of Historic Places (NRHP). The character-defining features of the bridge include the deck with guardrails, the superstructure comprised of steel and timber truss members, and the entirety of the substructure. The combined effect of the replacement of original materials comprising the deck, superstructure, and substructure would result in the loss of historic integrity and reduce the bridge's historical significance. This loss may render the bridge no longer eligible for the NRHP due to reduced historic integrity, particularly the aspects of original materials and workmanship.

Rehabilitation of the existing bridge would fail to meet most of the basic project objectives (see Appendix I, *Consideration of Rehabilitation Alternative*); rehabilitation of the existing bridge would not address many of the critical public safety issues

associated with the bridge, and would not address ongoing preservative leaching to the environment or vulnerability to sea level rise.

Additionally, rehabilitation would not achieve the same engineering performance as a replacement (new) bridge. The lifespan of bridge components retained in a rehabilitated bridge would be shorter than those of a new bridge, and would require an extensive ongoing maintenance program, including periodic replacement of timber and connection hardware (e.g., shear rings and bolts), resurfacing of the bridge deck, and painting of the bridge.

To maximize the public investment in a new Albion River crossing, the desired lifespan of the new structure is at least 75 years before major maintenance or rehabilitation is needed. However, components of a rehabilitated bridge would need major maintenance or replacement in as few as 10 years. Further, there is much uncertainty in rehabilitation projects as the extent of damage to certain bridge components may not be fully known until they are actually replaced. This uncertainty would have the potential to substantially increase the construction duration and associated traffic delays for the rehabilitation alternatives, increasing impacts to the traveling public and community.

Rehabilitation was considered as an alternative for the proposed project. However, after thorough analysis, due to its failure to meet most of the basic project objectives and including consideration of the age of and structural condition of the existing bridge, rehabilitation as a project alternative was eliminated from further review. See Appendix I for additional information on the rehabilitation alternatives, and environmental document (ED) Section 2.5, *Alternatives Considered but Eliminated from Further Discussion Prior to Draft EIR/EIS,* for discussion on alternatives that were considered for the project.

►Topic 2: Construction Duration

General Comment: *The project would take 4 to 6 years to construct.*

Master Response 2: Construction of the Build Alternatives is anticipated to take three years for Alternative 1 (West Alignment) and Alternative 2 (East Alignment), and five years for Alternative 3 (On-Alignment). Anticipated timelines include all activities associated with the project, including removal of the existing bridge. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct. See the discussion of each Design Option in the environmental document in Section 2.2.6, *Unique Features of Build Alternatives.* See also Table 6 of the ED.

►Topic 3: Coastal Act Policies

General Comment: *The project is not consistent with the California Coastal Act (CCA) and the Local Coastal Plan (LCP), particularly with policies pertaining to development within highly scenic areas (CCA Section 30251), whereas rehabilitation would be consistent with the CCA and LCP.*

Master Response 3: The Build Alternatives are consistent with CCA and LCP policies, including CCA Section 30251, as discussed in the environmental document in Table 9 of Section 3.2.3, *Coastal Zone,* as well as in the supporting document, the Community

Impact Assessment (Table 2-3). The identified preferred alternative (Design Option 2B – East Arch) would allow for expansive views beyond the bridge, with the arches framing the view of the river cove beneath them. The arch design is consistent with other bridges along the SR 1 coast, including in Mendocino County. The proposed project would not distract from the rural scenic characteristics of the present roadway, and would maintain a two-lane, scenic rural highway once constructed, consistent with the Local Coastal Plan.

Rehabilitation of the existing bridge would be inconsistent with many of the priorities set forth in the CCA, particularly Chapter 3 “Coastal Resources Planning and Management Policies”, and policies in the Mendocino County General Plan Coastal Element. Among others, rehabilitation of the existing bridge would not provide for safe multimodal access across the bridge (CCA Section 30210, Coastal Element Section 3.6-19), would not address the bridge’s vulnerability to sea level rise or tsunamis (CCA Section 30235, 30236, and 30253, Coastal Element Section 3.4), would not prevent ongoing leaching of chemical preservatives from the timber members (CCA Sections 30230, 30231, 30232, 30270, and 30001.5), and would not correct the turn north of the bridge, which is described as hazardous (Coastal Element Section 4.9).

►Topic 4: New Public Access

General Comment: *Public access should be incorporated into the project.*

Master Response 4: Consistent with California Streets and Highways Code Section 84.5, Caltrans has given full consideration of, and prepared a report on, the feasibility of providing a means of public access to the Albion River for public recreational purposes. The Public Access Feasibility Report and the ED identify that there is no deeded public access to the Albion River or the beach; all of the access points from land are on private property. With the project, as now, the public would be able to access the Albion River through the privately-owned Albion Campground with a day pass or by reserving a campsite for a fee. In 2024, the Albion River Campground website indicated that the general public was welcome to access the beach without charge during normal day-use hours if they do not park on private campground property and do not use the facilities. The other private access point, Schooner’s Landing Marina, has previously provided river access, but is currently closed. On the south side of the Albion River, self-propelled personal watercraft can be launched from a facility owned by Pacific Union College for a fee.

The Public Access Feasibility Report determined that providing new public access beyond the current existing access to the Albion River was not practical within the existing or proposed state right of way (ROW) due to impacts on adjacent private property, sensitive habitats, and lack of practical design options that would comply with the Americans with Disabilities Act access requirements.

The proposed project would provide a structure with a 75-year service life as well as widened shoulders and a pedestrian path which would provide safe and reliable access across the Albion River. These features of the proposed bridge would also offer enhanced coastal views over the Albion Flat. Further, the project proposes to improve

Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and realigning the road. These changes would improve public safety and accessibility to the Albion Campground.

►Topic 5: Public Access During Construction

General Comment: *The project would disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction.*

Master Response 5: For public safety purposes, the proposed project would temporarily limit and/or restrict public access to the Albion Flat Beach, Albion Campground, and Albion River outlet during construction. Pending right of way negotiations with the Albion Campground, certain Albion Campground facilities (e.g., campground office, parking lot, restrooms, picnic area, and the dock and marina) could remain open to visitors using the existing vehicle access from Albion River North Side Road or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. Recreational opportunities upstream of the proposed project would continue. The public would be notified about construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). The proposed project would not permanently block public access.

The project would not have significant impacts on recreation under CEQA; see ED Section 4.3.16, *Recreation.* See also ED Section 3.2.5, *Parks and Recreational Facilities,* for more information on the project impacts to recreation.

►Topic 6: Local Economy

General Comment: *The project could restrict access to key areas, including local businesses, for an extended period, which could result in a decrease in customer traffic, loss of revenue, and long-term harm to the local economy, which relies heavily on both residents and tourists who travel through the area.*

Master Response 6: The ED and Community Impact Assessment acknowledge that the proposed project could temporarily reduce regional tourism and cause short-term economic impacts, including a decrease in sales tax revenue in the Albion community. However, tourists would still have access across the bridge to local businesses (subject to traffic control) and would continue to patronize local business during construction. In addition, construction of the proposed project would generate direct and indirect temporary economic activity, including employment of workers required for construction and associated purchases of goods and services.

Economic impacts are largely a function of the duration of construction activity. The Build Alternatives are anticipated to take either three years or five years to construct, depending on the alternative. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct. The proposed project is not anticipated to cause permanent changes that would alter regional economic conditions,

nor alter operational traffic patterns on SR 1. The proposed project would reduce the risk of economic ramifications associated with potential bridge collapse or failure.

See ED Section 3.2.6, *Community Character and Cohesion,* for additional information, as well as the Community Impact Assessment (Section 4.2.2.1) for more detail. See also Master Response 7 for more information on traffic during construction.

►Topic 7: Traffic and Emergency Response

General Comment: *The project would lead to disruptions in traffic flow, detours, and access issues, and would result in extended driving times. This would affect my business operations, commute, and/or quality of life. The project would also disrupt emergency services.*

Master Response 7: Traffic control for the proposed project is standard, similar to traffic control associated with other Caltrans projects. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). Work would be coordinated with the local busing system and notification would be provided to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measures **TT-3** and **GHG-4,** and **AMM-PR-1**).

Traffic control would involve flagging or a temporary signal system. Anticipated delay times are worst case scenarios, based on the amount of traffic and length of the closure area. Overall delay times can depend on the time of day (e.g., commute hours) and time of year (e.g., the summer tourist season). The majority of delays are associated with reversing traffic control. This includes up to 15 minutes for flagging, and shorter times, typically up to 5 minutes, when a temporary signal system is in use. As noted, total delays are likely to be shorter at off-peak times. Traffic control associated with flagging is only when the construction zone is active. Intermittent traffic control, which would have delays up to 30 minutes, would only be used as needed, such as for setting up the temporary signal system.

One extended overnight 10-hour closure is anticipated for the project. This closure would precede the traffic switch from the existing bridge to the replacement bridge. The 10-hour closure would be timed to cause the least disruption to the public. In addition, messaging systems would be used to inform the public a minimum of 7 days in advance of the closure in order for the public to plan appropriately to avoid traveling through the area. Motorists would have the option of using state routes to detour around the closure or may elect to use other routes to cross the Albion River, which are not on the state highway system, at their discretion.

In relation to emergency services, emergency response agencies would be notified of the proposed project construction period and would have access to SR 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles across the bridge at all times (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes.

For more information on traffic control, see the *Traffic Control and Detours* subsection of the environmental document, under ED Section 2.2.5, *Common Design Features of the Build Alternatives.* See also the discussions under ED Section 3.2.8, *Utilities/Emergency Services* and ED Section 3.2.9, *Traffic and Transportation/Pedestrian and Bicycle Facilities.* See also the discussion of impacts under CEQA in ED Section 4.3.15, *Public Services,* and ED Section 4.3.17, *Transportation.*

►Topic 8: Hydrology and Floodplain

General Comment: *The project could potentially affect hydraulics and floodplains, including altering the natural flow of the wild and scenic Albion River.*

Master Response 8: The Build Alternatives were analyzed through hydraulic modeling and determined not to cause substantial hydraulic issues (see ED Section 3.3.1, *Hydrology and Floodplain*). In addition, the Build Alternatives would not cause a longitudinal encroachment of the base floodplain, propose actions that support probable incompatible floodplain development, result in significant impacts on natural and beneficial floodplain values, or constitute a "significant floodplain encroachment" as defined in 23 CFR Section 650.105(q). Further, the proposed project would not affect the free-flowing nature of the Albion River. With the exception of the lower concrete portion of the existing pier on the north bank, which would be retained to maintain current geomorphic processes, existing bridge pier foundations (pilings) would be removed to 3 feet below grade (Standard Measure **HF-2**), which would reduce resistance and blockage of water moving downstream in a flood event.

See the discussion in the environmental document, Sections 3.3.1, *Hydrology and Floodplain* and 3.2.4, *Wild and Scenic Rivers* for more information, and Section 4.3.10, *Hydrology and Water Quality*, for discussion of impacts under CEQA. See additional technical detail in the draft Final Hydraulic Report, the Location Hydraulic Study, and Section 3.1 of the Wild and Scenic Rivers Report.

►Topic 9: Air Quality

General Comment: *The project would contribute to air quality pollution.*

Master Response 9: While the project would have short-term air quality impacts associated with construction, standard measures would be followed, which limit those impacts. These standard measures require compliance with all applicable laws and regulations related to air quality, limit idling of vehicles, ensure adherence to most recent emissions reduction regulations, and include traffic management to minimize vehicle delays and idling emissions. In addition, the proposed project would implement controls to minimize the release of fugitive dust and toxic air contaminants due to emissions (see **AMM-AQ-1**).

The proposed project would not result in changes to the traffic volume, fleet mix, or roadway capacity, though increased traffic volumes are expected to occur due to population increases, which would occur with or without the project. As the proposed

project is not capacity increasing, there would be no impact on air pollutant emission rates relative to the No-Build Alternative for carbon monoxide (CO), particulate matter less than 10 micrometers in diameter (PM_{10}), particulate matter less than 2.5 micrometers in diameter ($PM_{2.5}$) and nitrous oxide (NO_x). The CO and NO_x emission rates would decrease over time when compared to the baseline condition due to fleet turnover from combustion engine to hybrid or electric motor vehicles. The PM_{10} and $PM_{2.5}$ emission rates would increase over time as a result of tire wear, brake wear, and road dust emissions from increased traffic volumes over time, which, as noted above, would occur with or without the proposed project.

See ED Section 3.3.6, *Air Quality*, and Section 4.3.3, *Air Quality,* for further discussion of air quality during and after construction. See the project-specific Air Quality Report for additional technical detail.

►Topic 10: Noise

General Comment: *The project would have significant, unmitigated noise impacts. The "significant" noise levels would potentially disturb residents and visitors.*

Master Response 10: Construction and associated noise would be temporary. Noise at any given time is based on multiple factors, such as equipment used, amount of equipment in operation, and timing and duration of activities. For example, pile driving, which is the loudest noise-generating construction activity, would only be required for specific activities such as construction of temporary trestles and new bridge foundations, and occurs during daytime hours over short durations with breaks in between each pile; pile driving would not be ongoing throughout the duration of construction. In addition, the project would implement minimization measures to reduce noise impacts, including providing acoustic shielding around pile driving hammers and implementing additional noise controls when operating outside typical hours (see **AMM-NOI-1).**

Following construction, the predicted highway noise levels do not substantially exceed the existing noise levels at nearby sensitive receptors. Further, noise reducing pavements (i.e., "quiet pavements") would be used, which have been shown to have at least a 3 dB decrease in noise levels. The proposed project would not have significant noise impacts under CEQA.

See ED Section 3.3.7, *Noise and Vibration*, for more information on noise, and Section 4.3.13, *Noise,* for information related to the CEQA significance call. See also the referenced Noise Study Report for additional technical detail.

►Topic 11: Energy

General Comment: *The project would require "significant" energy consumption.*

Master Response 11: The proposed project would not result in an inefficient, wasteful, or unnecessary consumption of energy. During construction, direct energy consumption would primarily occur through operation of heavy-duty construction equipment, material deliveries, and debris hauling. This represents a small demand on local and regional

energy consumption, and this demand would cease once construction is complete. Following construction, the proposed project would not result in changes in traffic volumes, vehicle mix, or any other factor that would cause an increase in direct energy consumption. Additionally, following construction safe multi-modal access would be available that could result in a decrease in direct energy consumption by local transportation users. Overall, the proposed project would not have a significant impact on energy under CEQA.

See environmental document Section 3.3.8, *Energy,* for a discussion of energy, and Section 4.3.6, *Energy*, for a discussion of impacts under CEQA. See also the project-specific Energy Technical memo prepared for the project for additional technical detail.

►Topic 12: Vehicle Miles Traveled

General Comment: *There is no analysis of the increase in Vehicle Miles Traveled (VMT), either during construction or during the life of the new bridge, or after construction is completed, though there is a projection of a substantial increase in the annual average daily traffic (ADT) on the bridge.*

Master Response 12: The proposed project would maintain a single lane in either direction, would not change access to the surrounding area or increase roadway capacity, would not change travel demand, or change traffic patterns, and therefore would not result in any increase in VMT. The increase in ADT described and accounted for in the environmental document (Section 3.2.9, *Traffic and Transportation/Pedestrian and Bicycle Facilities*) is a projection based on growth factors and is not a result of the proposed project.

►Topic 13: Environment

General Comment: *The project could lead to "significant" biological impacts, including habitat loss, and disruption to sensitive eelgrass beds and other biological resources. In addition, the project would have other environmental impacts such as soil erosion and water pollution.*

Master Response 13: A comprehensive environmental analysis for the proposed project was completed, which included an assessment of biological resources and water quality, among other topics.

The ED identifies measures to avoid and minimize environmental impacts throughout various sections, including measures for impacts to biological resources. Further, under CEQA, mitigation measures were identified for potentially significant impacts to certain biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments, and relevant sections of ED Chapter 3, *Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.* With implementation of mitigation, impacts to biological resources would be reduced to less than significant under CEQA.

Eelgrass is one of the biological resources assessed in the ED (see ED Section 3.4.1, *Natural Communities*). Under the identified preferred alternative (Design Option 2B –

East Arch), temporary impacts to eelgrass are estimated to be less than 0.01 acre (15.68 square feet), and no permanent impacts to eelgrass are anticipated.

Mitigation for eelgrass is described under **AMM-BR-8**, with additional detail provided in Appendix D, Section D.3.3, *Compensatory Mitigation for Seagrass*. All necessary standards outlined in the California Eelgrass Mitigation Policy would be followed, including the development of a comprehensive mitigation and monitoring plan to ensure no net loss of eelgrass. Adaptive management may be needed for restoration efforts. Restoration to offset impacts to eelgrass would be developed in coordination with regulatory agencies.

There would be no substantial impacts to water quality from the project, including from soil erosion. As discussed in ED Section 3.3.2, *Water Quality and Stormwater Runoff,* potential temporary impacts on water quality would be addressed by implementing standard BMPs, which can be found in Caltrans *Stormwater Quality Handbooks: Construction Site Best Management Practices (BMPs) Manual.* BMPs include soil stabilization, sediment control, spill prevention and control, among others.

See ED Section 3.4, *Biological Environment,* for a discussion of biological resources, which includes eelgrass. See also ED Section 3.3.2, as mentioned above for additional information on water quality. See relevant subsections under ED Section 4.3, *CEQA Environmental Checklist,* including Section 4.3.4, *Biological Resources,* and Section 4.3.10, *Hydrology and Water Quality,* for a discussion of impacts under CEQA. See also Appendix D for a summary of measures for impacts to biological and other resources, including for eelgrass.

This page is intentionally left blank.

Chapter 3. Federal, State, and Local Agency Comments

3.1 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

September 6, 2024

Liza Walker
Eureka Office Chief - North Region Environmental
California Department of Transportation
1656 Union Street
Eureka, CA 95501
AlbionBridge@dot.ca.gov

SUBJECT: ALBION RIVER BRIDGE PROJECT - STATE CLEARINGHOUSE NO: 2015042016

Dear Liza Walker:

On July 8, 2024, the California Department of Fish and Wildlife (CDFW) received a Draft Environmental Impact Report (DEIR) from the California Department of Transportation (Caltrans; Lead Agency) for the Albion River Bridge Project (Project), Mendocino County, California. CDFW understands the Lead Agency will accept comments on the Project through September 9, 2024.

As a Trustee Agency for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations. As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code (Fish & G. Code) that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as Trustee and Responsible Agency pursuant to the California Environmental Quality Act (CEQA; California Public Resource Code, § 21000 *et seq.*). CDFW participates in the regulatory process in its roles as Trustee and Responsible Agency to minimize Project impacts and avoid potentially significant environmental impacts by recommending avoidance and minimization measures. These comments are intended to reduce the Project's impacts on public trust resources.

Conserving California's Wildlife Since 1870

Project Description

As stated in the DEIR, Caltrans proposes to replace the existing Albion River Bridge (Caltrans Bridge #10-0136), which is located on State Route 1 (SR 1) in the community of Albion, Mendocino County, California. The Project limits on SR 1 are from post mile (PM) 43.3 to PM 44.2. The DEIR states the purpose of the Project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The Project considers three Build Alternatives that would replace the bridge west of the existing bridge alignment, east of the existing bridge alignment, and along the same alignment of the existing bridge. These Build Alternatives include arch and non-arch design options. The Project also considers a No Build alternative.

The DEIR contains many Standard Measures and Best Management Practices to avoid or minimize impacts to biological and other resources. Additionally, as summarized in DEIR Appendix D, the Project includes eight biological resources mitigation measures for potentially significant impacts to special status species and habitats.

Environmental Setting and Special Status Species

The Project is located just east of the Pacific Ocean within the Albion River estuary. The Project's biological study area contains potential habitat for at least 63 special status species, including 41 plants, three invertebrates, three amphibians and reptiles, five fishes, six birds, and five mammals (DEIR Appendix G). Additionally, the study area contains nine Sensitive Natural Communities and 14 acres of Waters of the State[1] (DEIR tables 48 and 52).

---

[1] "Waters of the state" means any surface water or groundwater, including saline waters, within the boundaries of the state (Cal. Wat. Code, § 13050).

CDFW Consultation History

CDFW consultation for this Project began in 2015, when Caltrans released a Notice of Preparation (NOP) for the DEIR. On April 30, 2015, CDFW provided comments on the Project's NOP. CDFW appreciates the level of communication and coordination by the Lead Agency. While many Project alternatives, potential Project impacts, and potential mitigation for those impacts have been discussed since 2015, the Final Environmental Impact Report (FEIR) should address CDFW's remaining comments.

CDFW looks forward to continued communication and coordination by the Lead Agency regarding specific Project components, impacts, and proposed mitigation strategies.

CDFW Permitting

Based on information provided in the DEIR, the proposed Project will have substantial impacts to the bed, bank and channel of the Albion River and other streams in the Project area. Caltrans should notify CDFW for a Lake or Streambed Alteration (LSA) Agreement. Based on information provided in the DEIR, CDFW agrees with the Lead Agency that the Project, as proposed, may result in take[2] of coho salmon (*Oncorhynchus kisutch*) and require CESA take authorization from CDFW. CDFW looks forward to continuing coordination with the Lead Agency to ensure that mitigation approaches will be compatible with state permitting requirements.

---

[2] "Take" means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (Fish and Game Code 86).

CDFW Comments on the DEIR:

1. **Project Alternatives**

1

The DEIR provides five design alternatives (1A, 1B, 2A, 2B, 3A) and a no-build alternative. All design alternatives involve temporary trestle construction (installation of 14-24 inch steel H pile or steel pipe using pile driving hammers). Two of the alternatives (1A & 3A) involve permanent installation of bridge piers within the channel (below the ordinary mean high-water mark). These two alternatives are expected to have the greatest hydroacoustic impacts to listed species. Additionally, CDFW is concerned that installing permanent piles within the channel could impact eelgrass (*Zostera marina*) and surfgrass (*Phyllospadix* spp.) habitats from scouring or other changes to channel hydrodynamics.

To minimize impacts to sensitive species and habitats within the aquatic environment, CDFW recommends the FEIR select a design alternative that does not involve permanent installation of piers within the Albion River channel **(Recommendation 1)**.

2. **CEQA Mitigation**

2

The DEIR's Environmental Commitment Record (ECR) appears to serve the purpose of a mitigation monitoring or reporting program/plan (CEQA Guidelines 15097), with additional commitments for impacts the Lead Agency has determined are less than significant without mitigation (i.e. "standard measures," as described on the DEIR). For ECR items that are mitigating for potentially significant impacts, those mitigation measures should include specific details on implementation unless the DEIR explains why it's impractical or infeasible to provide those details at this time. If specific details are not included, the mitigation measures should include specific performance standards the mitigation will achieve (CEQA Guidelines 15126.4(a)(1)(B)). Additionally, the impacts associated with mitigation implementation should be addressed when considering the Project's "whole of the action" (CEQA Guidelines 15003(h), 15063(a)(1), 15378(a), and 15126.4 (a)(1)(D)).

Therefore, the FEIR should include specific details regarding mitigation measure performance standards, success criteria, and potential impacts associated with mitigation implementation **(Recommendation 2)**.

3. **Mitigation Ratios**

3

For mitigation measures that contain mitigation ratios (e.g., AMM-BR-1 for Sensitive Natural Communities (SNC) and AMM-BR-9 for Wetlands/Waters and riparian), mitigation ratios of 1:1 would only be appropriate if impacts are restored to baseline conditions in less than one year from the impact.

For situations where baseline cannot be restored in less than one year, a higher mitigation ratio should be used to compensate for temporal loss of habitat function **(Recommendation 3)**.

4. **Impacts to Rare Plant Species**

4

CDFW recommends the Project result in no-net-loss of California Rare Plant Rank 1 and 2 taxa (rare, threatened, or endangered in California; CDFW 2024). If pre-Project conditions cannot be restored within one year, a mitigation ratio greater than 1:1 should occur to account for temporal losses **(Recommendation 4)**.

5. **The Mendocino Coast Mitigation Bank**

5

The Mendocino Coast Mitigation Bank is not creating credits with CDFW's mitigation bank program. These bank credits are not eligible for mitigating impacts within the purview of CDFW's permitting authority (e.g., Streambed Alternation and the California Endangered Species Act).

Therefore, the Project should propose mitigation for impacts within CDFW's permitting authority that do not rely on the Mendocino Coast Mitigation Bank **(Recommendation 5)**.

6. Seasonal Work Window for Coho Take Avoidance

6

The DEIR includes an in-water work window of June 15 - October 15. Coho salmon outmigrants are expected to peak in May but could outmigrate later in high water years, potentially well into June. To minimize impacts to coho salmon outmigrants, CDFW recommends a revised in-water work window of July 1 - October 15 **(Recommendation 6)**.

7. Early Coordination for CESA Take Authorization

7

The DEIR states that Caltrans will coordinate with CDFW to obtain either a Fish and Game Code section 2080.1 Consistency Determination or section 2081 Incidental Take Permit for potential effects to CESA-listed coho salmon. CDFW recommends Caltrans engage in early consultation to determine Project impacts to coho salmon and adequate mitigation. Any requests to conduct in-water work outside of the recommended work window could result in increased impacts to listed salmonids. If Caltrans anticipates in-water work window extension requests, these should be addressed early on to evaluate increased impacts to listed salmonids and mitigation options.

Therefore, CDFW recommends Caltrans engage in early consultation to determine Project impacts to coho salmon and adequate mitigation **(Recommendation 7)**.

8. Hydroacoustic Impacts

8

Hydroacoustic impacts from pile driving and other construction activities have the potential to impact salmonids and other marine and aquatic species that inhabit the Albion River estuary and use it as nursery habitat, such as rockfishes (*Sebastes* spp.), surfperches (Embiotocidae), English sole (*Parophrys vetulus*), kelp greenling (*Hexagrammos decagrammus*), saddleback gunnel (*Pholis ornata*), red Irish lord (*Hemilepidotus hemilepidotus*), and bay pipefish (*Syngnathus leptorhynchus*). The FEIR should describe in further detail the methods and amount of pile driving (e.g., when impact vs. vibratory driving will be used and estimated

amounts of each, i.e., number of strikes/minutes) as well as mitigation measures to avoid injurious sound pressure levels to fish.

9

CDFW recommends that a vibratory hammer is used for pile driving to the greatest extent possible to minimize hydroacoustic impacts. CDFW also recommends that sound attenuation, sound dampening methods, and a "soft start" procedure be required during pile driving activities. The DEIR discusses bubble curtains and isolation casings as sound attenuation systems that may be implemented. Additionally, sound dampening devices such as wooden blocks, pile cushions, and/or caps should be used during impact pile driving.

At the commencement of pile driving activities each day, or after pile driving has been paused for 30 minutes or more, a "soft start" procedure (i.e., ramp-up period) should be implemented to allow marine species that may be present to vacate the area before injury occurs. For impact pile driving, the "soft start" should consist of an initial set of three strikes at 40 percent energy, followed by one minute of inactivity, followed by two additional three-strike sets, before starting full-energy, continuous pile driving. For vibratory pile driving, the "soft start" should consist of a gradual increase of intensity to full-intensity driving **(Recommendation 8)**.

9. Description of Temporary and Permanent Piles

10

CDFW recommends the FEIR include a table that summarizes the number of piles, types of piles, seasonal timing and number of pile driving days, and the anticipated peak and accumulated sound exposure level (SEL) for the Lead Agency's preferred alternative. It should also include the number of years and days per year of in-water work, including the amount of time temporary piles will remain in the channel **(Recommendation 9)**.

10. Temporary Creek Diversion Plan

11

The DEIR states that contractors would be required to submit a Temporary Creek Diversion System Plan to Caltrans prior to any creek diversions. The

FEIR should provide more information and location details for any potential stream diversions that are anticipated to occur for this Project **(Recommendation 10)**.

11. **Eelgrass Habitat**

12

The DEIR provides estimated temporary and permanent impacts to eelgrass habitat for each design alternative, attributing temporary impacts to installation of temporary piers for work trestles and shading. However, the California Eelgrass Mitigation Policy (CEMP; NMFS 2014) defines localized temporary impacts as impacts of less than 100 square meters and fully restored within one year of the initial impact. As work trestles will remain within the channel for 3 to 5 years, it would not be possible for the impacted areas to be fully restored within one year and, as such, these impacts cannot be considered temporary in nature for eelgrass mitigation purposes. In accordance with the CEMP, any impacts identified by the post-construction survey(s) will require compensatory mitigation at a 1.2:1 ratio. "Natural" restoration of these areas, as mentioned in Mitigation Measure AMM-BR-8, is likely not an option for this Project. CDFW recommends removing references to "temporary" eelgrass impacts and natural restoration of impacted areas in the FEIR, unless there will be actual temporary impacts as defined by the CEMP.

13

CDFW appreciates the addition of reference to the CEMP, pre- and post-construction surveys, and a seagrass mitigation and monitoring plan to AMM-BR-8. The mitigation and monitoring plan should adhere to the CEMP and be developed in advance of or concurrent with Project permitting in consultation with CDFW, the National Marine Fisheries Service (NMFS), and other relevant agencies **(Recommendation 11)**. The mitigation and monitoring plan should include, but not be limited to, the following:

- Minimization of pile driving or placement of any construction equipment within eelgrass and surfgrass habitat to the maximum extent feasible (the CEMP defines eelgrass habitat as "areas of vegetated eelgrass cover...bounded by a 5 m wide perimeter of unvegetated area").

- Evaluation of the multi-year temporal loss of seagrass habitat caused by the Project.
- Pre-and post-construction surveys following the guidelines outlined in the CEMP:
    - Eelgrass surveys should include 1) spatial distribution, 2) areal extent, 3) percentage of vegetated cover, and 4) the turion (shoot) density.
    - All mapping efforts should be completed during the active growth period for eelgrass (May through September for northern California) and should be considered valid for a period of 60 days to ensure significant changes in eelgrass distribution and density do not occur between survey date and the Project start date. However, when the end of the 60-day validity period falls outside of the region-specific active growth period, the survey could be considered valid until the beginning of the next active growth period.
    - After construction, a post-action survey of the eelgrass habitat in the action area and at an appropriate reference site(s) should be completed within 30 days of completion of construction, or within the first 30 days of the next active growth period following completion of construction that occurs outside of the active growth period.
    - CDFW recommends annual monitoring surveys, including several years post-Project, to capture any changes in eelgrass and surfgrass habitat from scouring, sedimentation, and/or changes in local hydrodynamics caused by the Project.
- Compensatory mitigation at a minimum of a 1.2:1 ratio.
    - In northern California, a starting ratio of 4.82:1 is recommended to ensure mitigation success. That is, for each square meter of impacted eelgrass habitat, 4.82 square meters of new habitat with suitable conditions to support eelgrass should be planted with a comparable bottom coverage and eelgrass density as impacted habitat.
    - A reduced mitigation ratio may be considered if eelgrass is successfully transplanted well in advance of impacts.

- Mitigation monitoring should be completed for a minimum period of five years at the mitigation site and at appropriate reference site(s) to ensure success.

12. Harbor Seals

14

CDFW is concerned the DEIR does not adequately analyze or mitigate for potentially significant effects to Pacific harbor seals (*Phoca vitulina richardii*). CDFW asserts the Project may have a substantial adverse effect on, interfere substantially with the movement of, and/or impede the use of nursery sites of harbor seals in the area (DEIR Section 4.3.4, checklist items (a) and (d)). As described in the DEIR, harbor seals regularly transit through the Project site and utilize surrounding areas to feed and rest, including multiple haul-outs located nearby. The DEIR also states that frequent sightings of females with pups have been reported during late spring and early summer. Both in-air and underwater noise have the potential to impact harbor seals via direct injury, behavioral disruption, and exclusion from important habitat. The DEIR states that "in-air acoustic thresholds for harbor seals…would likely be exceeded with implementation of vibratory and impact pile driving and demolition" and suggests that the Permanent Threshold Shift (Level A) onset (i.e., permanent hearing loss) thresholds could likely be exceeded for harbor seals during vibratory pile driving since harbor seals frequent the Project area.

The DEIR concludes the Project's impacts on marine mammals, in general, will be "Less Than Significant with Mitigation Incorporated" (DEIR Section 4.3.4, checklist item (a)) and includes development of a Marine Animal Monitoring Plan (MAMP) in its Environmental Commitments Record (AMM-BR-6) to reduce impacts to marine mammals. However, Caltrans has excluded harbor seals from this mitigation measure due to "the abundance and frequent presence of harbor seals in the vicinity of the cove and river", because stopping work for harbor seals would be infeasible for the construction schedule. The DEIR then appears to dismiss any potentially significant impacts to harbor seal because it is a "common species" and assumes population-level effects will not occur, without providing evidence of this assumption.

CDFW disagrees with the DEIR's conclusion that harbor seals would not be significantly impacted by the Project. The DEIR determines that impacts to marine mammals from the Project will be "Less than Significant with Mitigation Incorporated;" however, impacts to harbor seals are not mitigated for. While harbor seals may be a common species, they are still protected under the Marine Mammal Protection Act (MMPA) from harassment, hunting, capturing or killing. Any such impacts to harbor seals could be considered significant. The Project's in-water work window would overlap with the Northern California pupping season, which extends through June (NOAA Fisheries 2022; this is incorrectly stated in the DEIR as April through May). For at least 3 to 5 years, harbor seals would be exposed to high levels of underwater sound during four months of the year and in-air noise as well as some underwater noise all year long. While harbor seals may be able to flee before injury occurs, CDFW expects behavioral changes and habitat exclusion to occur for any design alternative. For the reasons outlined above, CDFW asserts that, without mitigation, the Project could have significant impacts on harbor seals via direct substantial adverse effects (Section 4.3.4 (a)) and/or substantial interference with/impedance of movement or use of nursery sites by harbor seals (Section 4.3.4 (d)).

The FEIR should analyze the above impacts to harbor seals in greater detail. Additional evaluation of harbor seals' (including pups') use of the Project area is recommended. CDFW recommends the FEIR include harbor seals in the MAMP. If work stoppage is infeasible, other mitigation, such as an adaptive management plan, should be developed in coordination with CDFW and NMFS. Caltrans should consult with NMFS regarding incidental take authorization of harbor seals under the MMPA **(Recommendation 12)**.

13. Soil Contamination

15

The DEIR states that a preliminary site investigation performed in December 2014 determined the chemical preservative treatment in the existing bridge is leaching into soil immediately adjacent to the bridge foundations including contaminants of potential concern (COPC) consisting of arsenic, chromium, hexavalent chromium, and lead. The DEIR also states the COPC present a potential risk to the adjacent Albion River sediment and porewater. Given that the last site investigation was completed over 10 years ago, CDFW recommends the FEIR require a pre-construction site investigation to evaluate current contamination in the Project area and that a soil contamination plan be followed during bridge demolition to ensure contaminated soil is properly managed and does not impact the surrounding environment, including the Albion River **(Recommendation 13).**

14. Impacts to Public's Fish and Wildlife Resource Recreation

16

It appears the Project will result in closures and restrictions of the river, beach, and access to other natural resources that are used and enjoyed by the public. While AMM-PR-1 will provide public outreach regarding construction activities and planned closures, the public's recreation, as well as use and enjoyment, related to this unique location of California's diverse fish, wildlife, plant resources and habitats will be impacted for multiple years. Uses that could be impacted include, but may not be limited to, fishing, harvest of aquatic species, wildlife viewing, research, and cultural gathering. The FEIR should consider additional ways the Project can mitigate these impacts. Examples include increasing or enhancing public access or experience value (e.g., interpretive signage) for fish and wildlife recreation **(Recommendation 14).**

Summary of Recommendations

17

1. To minimize impacts to sensitive species and habitats within the aquatic environment, CDFW recommends the FEIR select a design alternative that does not involve permanent installation of piers within the Albion River channel.
2. The FEIR should include specific details regarding mitigation measure

performance standards, success criteria, and potential impacts associated with mitigation implementation.

3. For SNC and aquatic or riparian impacts where baseline cannot be restored in less than one year, a higher mitigation ratio should be used to compensate for temporal loss of habitat function.
4. CDFW recommends the Project result in no-net-loss of California Rare Plant Rank 1 and 2 taxa (rare, threatened, or endangered in California). If pre-Project conditions cannot be restored within one year, a mitigation ratio greater than 1:1 should occur to account for temporal losses.
5. The FEIR should propose mitigation for impacts within CDFW's permitting authority that do not rely on the Mendocino Coast Mitigation Bank.
6. To minimize impacts to coho salmon outmigrants, CDFW recommends a revised in-water work window of July 1 - October 15.
7. CDFW recommends Caltrans engage in early consultation to determine Project impacts to coho salmon and adequacy of mitigation.
8. The FEIR should describe in further detail the methods and amount of pile driving and mitigation measures to avoid injurious sound pressure levels to fish. CDFW recommends that a vibratory hammer is used for pile driving to the greatest extent possible. CDFW also recommends that sound attenuation (e.g., bubble curtain), sound dampening methods (e.g., wooden block), and a "soft start" procedure be required during pile driving activities.
9. The FEIR should include a table that summarizes the number of piles, types of piles, seasonal timing and number of pile driving days, and the anticipated peak and accumulated SEL for the Lead Agency's preferred alternative. It should also include the number of years and days per year of in-water work.
10. The FEIR should provide more information and location details for any potential stream diversions that are anticipated to occur for this Project.
11. CDFW recommends removing references to "temporary" eelgrass impacts and natural restoration as mitigation in the FEIR. The seagrass mitigation and monitoring plan should adhere to the CEMP and be developed in advance of, or concurrent with, Project permitting in consultation with CDFW, NMFS, and other relevant agencies.
12. The FEIR should analyze impacts to harbor seal in greater detail. Additional evaluation of harbor seals' use of the Project area is recommended.

CDFW recommends the FEIR include harbor seals in the MAMP. If work stoppage is infeasible, other mitigation, such as an adaptive management plan, should be developed in coordination with CDFW and NMFS. Caltrans should consult with NMFS regarding incidental take authorization of harbor seals under the MMPA.

13. The FEIR should require a pre-construction site investigation to evaluate current contamination in the Project area and that a soil contamination plan be followed during bridge demolition to ensure contaminated soil is properly managed and does not impact the surrounding environment, including the Albion River.
14. The FEIR should consider additional ways the Project can mitigate impacts to public use and enjoyment. Examples include increasing or enhancing public access or experience value (e.g., interpretive signage) for fish and wildlife enjoyment.

Thank you for the opportunity to comment on this DEIR. CDFW staff are available to meet with you to consult with or address the contents of this letter in greater depth. If you have questions on this matter or would like to discuss these recommendations, please contact Senior Environmental Scientist Specialist Greg O'Connell at Gregory.OConnell@Wildlife.ca.gov.

Sincerely,

Bartlett, Tina @Wildlife

Digitally signed by Bartlett, Tina@Wildlife
DN: DC=Gov, DC=Ca, DC=Dfg, DC=AD, OU=DFG Divisions, OU=(1) NR, OU=Users, CN="Bartlett, Tina@Wildlife"
Reason: I am approving this document
Location:
Date: 2024.09.05 16:57:02-07'00'
Foxit PDF Editor Version: 13.0.1

Tina Bartlett, Regional Manager
Northern Region

ec: Page 15

ec: Julia Krog
Mendocino County Planning & Building Department
KrogJ@mendocinocounty.gov

Susan Stewart
North Coast Regional Water Quality Control Board
Susan.Stewart@waterboards.ca.gov

Abbie Strickland
California Coastal Commission
Abigail.Strickland@coastal.ca.gov

Gregory Schmidt
U.S. Fish and Wildlife Service
Gregory_Schmidt@fws.gov

Elena Meza
NOAA Fisheries
Elena.Meza@noaa.gov

Michael Orellana
U.S. Army Corps of Engineers
Michael.S.Orellana@usace.army.mil

State Clearinghouse, Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Rebecca Garwood, Michael van Hattem, Greg O'Connell, Angela Liebenberg, Amanda Canepa
California Department of Fish and Wildlife

Citations

CDFW. 2024. Special Vascular Plants, Bryophytes, and Lichens List, July 2024. Biogeographic Data Branch, California Department of Fish and Wildlife. Retrieved August 6, 2024, from https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

[NMFS] National Marine Fisheries Service. 2014. California Eelgrass Mitigation Policy and Implementing Guidelines. Retrieved August 6, 2024, from https://media.fisheries.noaa.gov/dam-migration/cemp_oct_2014_final.pdf.

NOAA Fisheries. 2022. Harbor Seals Pupping Timeframes Along the West Coast. NOAA Fisheries West Coast Regional Office. Retrieved August 6, 2024, from https://www.fisheries.noaa.gov/resource/map/harbor-seals-pupping-timeframes-along-west-coast.

Response to CDFW

1. It is understood that CDFW prefers an alternative that does not involve permanent installation of piers within the Albion River channel. The identified preferred alternative—Design Option 2B (East Arch)—does not include installation of permanent piers in the channel.
2. As CDFW notes, the Environmental Commitments Record (ECR) in Appendix D.2 fulfills the CEQA requirement for a Mitigation Monitoring and Reporting Program under CEQA Guidelines 15097. In addition to the ECR and its summary of avoidance, minimization, and/or mitigation measures, additional information on biological mitigation measures is included in Section D.3, *Potential Off-site Mitigation for Biological Impacts.* As shown in Appendix D, Caltrans has committed to mitigation for this project, identified types of potential actions to mitigate significant impacts, and identified mitigation objectives as required by CEQA. Specific details for mitigation measures will be further developed after design refinement of the identified preferred alternative and would be coordinated with regulatory agencies. This includes finalization of the performance standards provided in Appendix D, such as final ratios for sensitive natural communities, eelgrass, and wetlands and waters, as well as the funding amounts for listed salmonids, which would depend on an accepted estimate for potential *Take* of listed salmonids under FESA and CESA, pending consultation with relevant agencies. Caltrans understands that impacts associated with mitigation implementation are considered part of the project. Mitigation for impacts to biological resources would involve mitigation bank credit purchases and/or participation through funding of habitat improvement projects. Accordingly, no significant impacts associated with on-site or off-site mitigation are currently anticipated.
3. As noted in the environmental document (ED), ratios may vary depending on the type of impact and the type of mitigation. Final ratios would be determined in coordination with permitting agencies after design refinement of the preferred alternative.
4. See ED Section 3.4.3, *Plant Species,* for a discussion of the California Rare Plant Rank (CRPR) 1 taxa that would be affected by the project, including impacts to the species, as well as ED Section 4.3.4, *Biological Resources* for a discussion on impacts under CEQA; there are no CRPR 2 species in the project area. As the project is not anticipated to have a significant effect to California Rare Plant Rank 1 or 2 taxa, mitigation for special status species under CEQA is not required. However, with the standard measures implemented, such as revegetation and additional protective measures related to plant species, the identified preferred alternative (Design Option 2B) is not anticipated to result in a net loss of CRPR 1 species present in the project area.
5. The Mendocino Coast Mitigation Bank is anticipated to be accepted by most of the permitting agencies that will be issuing permits for the proposed project. Mitigation banking generally has many benefits including larger, more functional habitats and ecosystem services, no temporal loss, management in perpetuity,

meeting “no net loss” of wetlands, permanent protection of the ecosystem, cost reductions, and overall efficiency of permitting. While CDFW has the ability to approve bank credits when appropriate from banks they are not signatory to, it is understood that CDFW is not supportive of using the Mendocino Coast Mitigation Bank for this project. For resources under CDFW’s jurisdiction, alternative compensatory mitigation may be implemented that is consistent with and would meet the objectives of the mitigation measures identified in the ECR. Caltrans will continue coordination with permitting agencies in the next phase of the project.

6. The primary outmigration period of juvenile salmonids is between March or February and early June, which is outside of the in-water construction period. While some individuals may be migrating down-river/out to sea during the beginning of the in-water construction period, this number would be small. Further, as discussed in more detail in the Natural Environment Study (NES; Section 4.3.14), the lack of cover and absence of velocity refugia within the ESL, and timing of pile driving during the day would further reduce the chances of impacts to outmigrants. The ED does assess impacts with the assumption that salmonid species could be impacted and minimized impacts as much as feasible while allowing for construction of the project. In addition, Caltrans met with CDFW in 2023 to discuss salmonids and associated outmigration times. A CDFW fisheries biologist stated that most coho smolts would have left the river channel and surrounding nearshore environment by the initiation of in-water work beginning June 15 (NES Section 4.3.14, pg. 300). While the ED acknowledges that, despite the avoidance and minimization measures proposed, there is still a chance that coho smolts could be present in the ESL and potentially impacted by project construction, CDFW’s suggestion to limit in-water work to July through October would likely result in an additional in-water work season, therefore exposing other sensitive resources to another summer of potential adverse impacts while resulting in minimal benefit for only a few coho smolts that might be moving through the project area in mid to late June. Caltrans will prepare a Biological Assessment and initiate Section 7 consultation with NMFS for federally listed salmonids and will coordinate with CDFW to obtain a Consistency Determination or Incidental Take permit for potential impacts to state-listed coho salmon. Caltrans has included a measure in the project to address impacts to fish; see **AMM-BR-10**.
7. See response to Response 6 above. In addition, Caltrans has been closely coordinating with CDFW and other agencies in relation to this project and potential impacts and mitigation and will continue to do so.
8. Under CEQA, an EIR is intended to be a summary of technical data in sufficient detail for assessment of environmental impacts; highly technical detail is avoided and is contained in technical reports (CEQA Guidelines 15147). The types of piles and installation methods associated with project components and bridge removal methods, in addition to potential for impacts are discussed in the construction impacts section for Chinook Salmon under ED Section 3.4.5, *Threatened and Endangered Species.* Additional detail on methods and assumptions used when assessing impacts to salmonids and other marine and

aquatic species in the project area is included in the Natural Environment Study (NES) prepared for the project.

As stated in the ED, activities that could cause hydroacoustic impacts to fish would avoid the primary migration period for listed fish species within the Albion River. Additionally, all hydroacoustic activities would be monitored by a trained and experienced hydroacoustic specialist during all operations that have the potential to produce impulsive sound waves to identify when abatement is necessary, and ensure established daily limits and thresholds are not exceeded. These limits and thresholds would be included in the Hydroacoustic Monitoring Plan prepared for the project (Standard Measure **BR-2[F]**). Hydroacoustic monitoring would comply with the terms and conditions of Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA) consultations.

9. CDFW's recommendations are noted. Type and duration of bridge pile installation methods are dependent on the substrate and structural engineering specifications for the bridge and may or may not allow for flexibility in using alternative methodologies. However, Caltrans anticipates additional details on attenuation methods would be considered in coordination with regulatory agencies during consultation under FESA and CESA and coordination with NMFS under MMPA permitting. Consistent with Standard Measure **BR-2(F)**, a sound attenuation system (e.g., bubble curtain) would be implemented for piles installed in water. Additionally, **AMM-BR-6** and **AMM-BR-11** would be implemented, which include measures to reduce impacts of hydroacoustic noise on marine animals.
10. See Response 8 above. The environmental document includes sufficient detail for assessment of environmental impacts; see Section 3.4, *Biological Environment*. See the NES for additional technical detail. In addition, for impacts to federal and state listed species, all relevant and necessary information will be provided to regulatory agencies during consultations under FESA and CESA and for permitting of the project.
11. Depending on the amount of water present during construction, a Temporary Creek Diversion may be needed at IS-1 and IS-3 and associated culverts (C-2 and C-10) due to culvert work. A diversion may also be needed for IS-2, which would be affected by the access roads to the existing and new piers on the south bank. Clarifications are included in the Final ED, and information on diversion would be further detailed in permit applications prior to construction and when project plans are more refined.
12. The ED is a public-facing document. Plain language is required under CEQA (CEQA Guidelines 15140) so that the public can readily understand the project. Therefore, in simple terms, and for consistency, if an area can be restored, it is considered temporary. As stated in **AMM-BR-8**, Caltrans would comply with all standards in the CEMP, including a final minimum ratio of 1.2:1. Mitigation ratios would be discussed further with agencies in the permitting phase of the project and would be detailed in the proposed Seagrass Mitigation and Monitoring Plan.

This includes higher ratios for temporal impacts to eelgrass; in the case of the CEMP, this would be applied for impacts that last longer than a year. However, it is anticipated that some effects, such as from shading, may restore naturally.

13. As stated in **AMM-BR-8**, all necessary standards outlined in the CEMP would be followed. Caltrans would coordinate with NMFS, CDFW and other relevant agencies on the mitigation and monitoring plan for eelgrass. This plan would be developed in the permitting phase of the project.

14. The Draft EIR/EIS, and the NES referenced therein, describes in adequate detail the presence of Pacific harbor seals within the Aquatic Species Biological Study Area (BSA) and, rather than dismissing the potential impacts of project construction, outlines the possibilities and differences in potential impacts under each proposed Design Option. As described in the document, harbor seals are not listed as “endangered” or “threatened” under FESA or CESA, and they are not considered “depleted” under the Marine Mammals Protection Act (MMPA). Harbor seals are the most common pinniped in California, with 400-600 known haul-out locations along the mainland of California and offshore islands. Small numbers of harbor seals have frequently been observed and reported to visit upriver sites to feed and bask, including at a haul-out recorded at Schooner’s landing approximately 0.4 mile east of the project Biological Study Area, as well as out in the Pacific Ocean both north and south of the Albion River, including near Albion Head, Stillwell Head, Buckhorn Head, and Van Damme to the north, and Salmon Point and Navarro Point to the south.[2,3] While females with pups have been reported in the project area, the area of impact is not a pupping area for harbor seals.

    As noted, harbor seals may be affected by construction activities that produce airborne and hydroacoustic noise. Airborne noise, such as from pile driving and drilling, could disturb harbor seals. However, construction activities that could produce noise and cause behavioral disturbance would not be continuous, and construction is temporary. Airborne noise would not be expected to cause long-term or permanent behavioral disturbance to harbor seals. In addition, these activities would be in areas of regular stressors from human activities, and there are many haul-out locations both upstream of the project area and in the Pacific Ocean that harbor seals can disperse to if disturbed. Temporary disruption to the most common pinniped in California is not anticipated to significantly affect the species.

    Hydroacoustic sound, which could be generated by impact pile driving, vibratory installation of sheet piles, non-impulsive pile driving, and hoe-ramming, could reach levels for behavioral disturbance, including temporary hearing loss, and some activities could lead to hearing loss with incomplete recovery. However, to reach the level of permanent injury from a single strike, a harbor seal would need

[2] Earthworks. (2013). Pinniped Haul-Out Site: California, 2013. Retrieved September 2021 from https://earthworks.stanford.edu/catalog/stanford-cq376yf4339

[3] CDFW. (2005). Harbor Seals. Biographic Information and Observation System (BIOS). Retrieved from https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv.

to be very close to construction—less than 33 feet (10 meters) for all alternatives. The cumulative SEL threshold—the total amount of acoustic energy an animal can receive from single or multiple strikes without injury from noise, based on noise that occurs up to 12 hours a day—may reach the edges of the Aquatic Species BSA (3,963 feet [1,200 meters] from the mouth of the Albion River and 1,312 feet [400 meters] upstream) for Alternative 3, but would have more limited distances for the other project alternatives, including the identified preferred alternative, Design Option 2B (East Arch) (see Table 62 in the environmental document).

As noted above, a harbor seal would have to be very close to construction activities to be injured from a single strike. While the cumulative threshold expands to a larger area, it takes time to reach that level. If disturbed, harbor seals could disperse to the other nearby haul-out locations both upstream and out in the Pacific Ocean. In addition, hydroacoustic sound would only be generated during certain activities; it is not a consistent noise throughout the construction season and is not expected to last the duration of every in-water construction season. A hydroacoustic monitoring plan would be prepared for the project (Standard Measure **BR-2 [F]**), which may include sound attenuation systems, pending consultation with NMFS under the MMPA.

However, even if the project results in permanent hearing loss in individual harbor seals, the percentage of the population that can be removed while still allowing the species to maintain its optimum sustainable population (referred to as the potential biological removal level) is 10%. This was calculated at 1,641 individuals (according to 2012 population level estimates)[4]. With the relatively low numbers of human-induced mortality from commercial fisheries or other human sources (average of 31/year), the small number of animals that could sustain injury due to elevated sounds from project construction would be insignificant at the population level. In addition, Caltrans has been in contact with NMFS regarding impacts to harbor seal populations. NMFS has no concern over potential population-level effects to harbor seal as the California stock is large and there is plenty of alternate habitat available. Potential harassment would be addressed through consultation under the MMPA.

In summary, while harbor seals regularly travel through the area, there are many haul-out locations both upstream and in the Pacific Ocean for harbor seals to disperse to if disturbed. Project activities that produce airborne and hydroacoustic noise are not continuous, and harbor seal could continue to pass through the project area. Harbor seals are the most common pinniped in California, and hearing loss in individual harbor seals would not result in a population-level effect.

Caltrans maintains that the project's impacts to harbor seal are less than significant, and mitigation under CEQA is not necessary. ED Section 3.4.4,

[4] National Oceanic and Atmospheric Administration (NOAA) Fisheries. (2015). Harbor Seal (*Phoca vitulina richardii*): California Stock. Retrieved from https://media.fisheries.noaa.gov/dam-migration/po2014sehr-ca_508.pdf.

Animal Species, and Section 4.3.4, *Biological Resources,* have been updated for clarity. However, to further reduce impacts to harbor seal, Caltrans would include Measure **AMM-BR-11.** Under this measure, initiation of pile driving would be avoided when harbor seals are within the 33-foot (10-meter) single-strike injury isopleth, and soft starts would be used to warn animals out of the vicinity if in the area, at a distance to be determined through coordination with NMFS. Caltrans would consult with NMFS under the MMPA for marine mammals such as harbor seal, and the appropriate take authorization obtained. Consultation may result in additional avoidance and minimization measures to reduce impacts to listed and non-listed marine mammal species (such as identification of thresholds for sensitive age classes).

Caltrans notes the comment on the pupping timeframe for harbor seal; the ED has been updated to reflect the NOAA pupping timeframe of March to June, with a peak in mid-May.

15. Caltrans has policies and procedures for managing and disposing of contaminated soil. Part of these policies require preparation of soil or groundwater management plans for construction that follow all applicable federal, state, and local environmental regulations. The plans would include identifying procedures for excavating, stockpiling, dewatering, transporting, and disposing of contaminated soil and/or groundwater. Characterization of contaminated soil for disposal would also be required. See Measure **AMM-HW-7**. This measure requires that soil beneath the bridge site be handled in accordance with Non-Standard Special Provision (NSSP) 14-11.11, Department Generated Contaminated Soil, which would contain these requirements.
16. Restrictions on the Albion River and other recreational facilities are discussed in Section 3.2.4, *Wild and Scenic Rivers*, and Section 3.2.5, *Parks and Recreational Facilities*. As described, while the Albion Campground would be encumbered by construction, and no access would be permitted to the beach during construction, other campground facilities, such as the parking lot and docks could remain open to the public. Additionally, the Albion River's outlet to the Pacific Ocean would remain open during construction, except when intermittent passage closures are necessary for safety purposes to facilitate bridge construction or demolition. Recreational opportunities upstream of the proposed project would continue. Therefore, the public would still be able to access this area for recreation during the construction period. In addition, all impacts would be temporary, lasting only during construction, and there are multiple other campgrounds with coastal access located within a reasonable distance to the project site. See Master Response 5 (Public Access During Construction) for additional information. The project would have no significant impact to recreation under CEQA; mitigation is not required.
17. See Comments 1 through 16 above.

3.2 DEPARTMENT OF THE INTERIOR

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
2800 Cottage Way, Room E-1712
Sacramento, CA 95825

September 3, 2024

IN REPLY REFER TO:
ER 24/0308
4111

Liza Walker
Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

Subject: U.S. Department of the Interior Comments – Albion River Bridge Project DRAFT Environmental Impact Report/ Environmental Impact Statement and Draft Section 4(f) Evaluation, June 2024

Dear Lisa Walker:

1

The U.S Department of the Interior (Department), as required under Section 4(f) of the Department of Transportation Act of 1966 and Section 6(f) of the Land and Water Conservation Fund Act of 1965, has reviewed the draft Section 4(f) Evaluation for the Albion River Bridge project.

The Department, through the National Park Service, concurs that there is no feasible and prudent alternative for the use of the Albion River Bridge. We further concur that no 6(f) resources exist in the project area.

The Department has no objection to Section 4(f) and 6(f) approval of this project. If you have specific questions related to our comments, please contact Danette Nolan Woo at Danette_Woo@nps.gov. For all other questions, please contact me at Viktoriya_Sirova@ios.doi.gov.

Sincerely,

VIKTORIYA SIROVA
Digitally signed by VIKTORIYA SIROVA
Date: 2024.09.03 10:36:39 -07'00'

Vika Sirova
Regional Environmental Protection Specialist

TRANSMITTED ELECTRONICALLY – NO HARDCOPY TO FOLLOW

Electronic distribution: albionbridge@dot.ca.gov

cc: Shawn Alam, Department of the Interior: Shawn_Alam@ios.doi.gov
Roxanne Runkel, National Park Service: Roxanne_Rrunkel@nps.gov
Danette Woo, National Park Service: Danette_Woo@nps.gov

Response to DOI

1. Caltrans notes the Department of the Interiors' review and concurrence that there is no feasible and prudent alternative for the use of the Albion River Bridge, and that there are no Section 6(f) resources in the project area.

3.3 ELK VOLUNTEER FIRE DEPARTMENT

Elk Volunteer Fire Department
P.O. Box 151 • Elk, California 95432
707-877-3444

September 5, 2024

Re: Albion River Bridge

Dear Liz Walker,

1

The Elk Volunteer Fire Department has very strong concerns about the potential for a significant traffic disruption which will be caused by the proposed Albion Bridge Replacement Project, as well as, the Salmon Creek Bridge Replacement Project.

As one of the three Basic Life Support ambulance services on the Mendocino Coast, two of which are located on the South Coast, our response times for emergency transports would be severely impacted. In fact, ALL emergency services on the Mendocino Coast will be negatively affected by this project. In addition, Adventist Health Mendocino Coast Ambulance, which is our Advanced Life Support service and responds to calls throughout coastal Mendocino County, would be delayed in responding to the needs of this geographical area. This is unacceptable. In an emergency situation, a delay of 15 minutes could be the difference between life and death.

What are Cal Trans plans for rerouting traffic for up to SIX years during the proposed bridge project(s)? We have received no information about what the expected routes are for emergency responders.

Again, we are concerned for the well-being of our Community, as well as, the tremendous amount of visitors who travel to our area daily. Your prompt response to this letter is greatly appreciated.

Sincerely,

Bob Matson

Bob Matson
Fire Chief, Elk Volunteer Fire Department

Response to Elk Volunteer Fire Department

1. Caltrans understands the importance of access for emergency services on the Mendocino Coast. The identified preferred alternative, Design Option 2B, is anticipated to last 3 years, not six; see also Master Response 2 (Construction Duration). The traffic control proposed for the Albion River Bridge Project is typical of what is seen in other highway construction projects; it is not anticipated that the project would cause substantial traffic disruption. See Master Response 7 (Traffic and Emergency Response) for more information related to traffic control. In addition, as noted in Standard Measure **UE-1**, all emergency response agencies in the project area would be notified of the proposed project's construction schedule and would have access to SR 1 throughout the construction period. And, in compliance with **AMM-TT-1**, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles at all times. The project would not substantially affect emergency response services or evacuation routes.

3.4 NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

California Water Boards

Gavin Newsom, Governor
Yana Garcia, Secretary for Environmental Protection

North Coast Regional Water Quality Control Board

TO: Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street Eureka, California 95501
albionbridge@dot.ca.gov

FROM: Susan Stewart, Environmental Scientist / Caltrans Liaison
NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

DATE: September 4, 2024

SUBJECT: **ALBION RIVER BRIDGE PROJECT**
DRAFT EIR/EIS AND DRAFT SECTION 4(f) EVALUATION
SCH# 2015042016 (EA: 01-40110)

Dear Liza Walker,

On July 12, 2024, the North Coast Regional Water Quality Control Board (Regional Water Board) received a Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) and Draft Section 4(f) Evaluation from the California Department of Transportation (Caltrans) for the Albion River Bridge Project (Project). The draft EIR/EIS compares and evaluates the potential impacts between three Build Alternatives. The draft EIR/EIS notes that comments must be submitted no later than September 9, 2024. The Regional Water Board hereby submits the following comments.

Project Overview
Caltrans proposes to replace the existing Albion River Bridge (Caltrans Bridge #10-0136), which is located on State Route (SR) 1 in the community of Albion, Mendocino County, California. The project limits on SR 1 are from post mile (PM) 43.3 to PM 44.2. The purpose of the project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The project considers three Build Alternatives that would replace the bridge west of the existing bridge alignment, east of the existing bridge alignment, or along the same alignment of the existing bridge. These Build Alternatives include arch and non-arch design options. The project also considers a No-Build alternative.

Regional Water Board (RWB) Permitting
The proposed Project will require a Water Quality Certification under section 401 of the Clean Water Act (33 U.S.C. § 1341) for activities related to Project construction within or affecting waters of the U.S. and waters of the State.

1

RWB Comment 1): The DEIR/EIS describes five design alternatives (1A, 1B, 2A, 2B, 3A) and a no-build alternative. The Regional Water Board favors the Least Environmentally Damaging Practicable Alternative (LEDPA), a design that would minimize permanent and temporary impacts to aquatic resources, including impacts to three parameter wetlands, river and river bank, and riparian areas. All permanent impacts will require compensatory mitigation.

2

RWB Comment 2): Evaluation of the developed project design and plans for implementation, including construction access, dewatering for construction activities, and water quality monitoring will be critical for project approval. Detailed plans for construction dewatering and water quality monitoring must be approved prior to construction as part of the Water Quality Certification process. A water quality monitoring plan must comply with the water quality objectives for Albion River as listed within the Basin Plan for the North Coast Region.

3

RWB Comment 3): While the possibility of using the Mendocino Coast Mitigation Bank is further explored, mitigation alternatives should be considered including on-site mitigation and seeking mitigation off-site at another agency-approved location. The Project is beyond the primary and secondary service areas for the Mendocino Coast Mitigation Bank, and the Regional Water Board will not likely allow the use of this mitigation bank for permit compliance given the current service areas. Avoidance and minimization measures should be fully explored and implemented.

4

RWB Comment 4): Any off-site and out-of-kind mitigation for impacts to aquatic resources would be required at a higher mitigation ratio using the Army Corps mitigation calculator. Habitat preservation at an off-site location may require a mitigation ratio much higher than enhancement or creation. The Regional Water Board requests that any proposed off-site mitigation be well identified prior to submittal of a Water Quality Certification application and the mitigation calculator be prepared and submitted with the permit application.

5

RWB Comment 5): The Regional Water Board favors post-construction stormwater treatment on-site in vegetated swales. Stormwater treatment off-site in a location nearby and within the same watershed may be considered.

Thank you for providing the Regional Water Board with the opportunity to comment on this draft EIR/EIS. If you have any questions or comments or would like to discuss these recommendations, please contact Environmental Scientist, Susan Stewart at (707) 576-2657 or by email at Susan.Stewart@waterboards.ca.gov.

Best regards,

Susan Stewart

cc: State Clearinghouse, Office of Planning and Research,
State.Clearinghouse@opr.ca.gov

Gregory Schmidt
U.S. Fish and Wildlife Service
Gregory_Schmidt@fws.gov

Elena Meza
NOAA Fisheries
Elena.Meza@noaa.gov

Michael Orellana
U.S. Army Corps of Engineers
Michael.S.Orellana@usace.army.mil

SF U.S. Army Corps of Engineers
CESPN-Regulatory-Info@usace.army.mil

Peter Allen
California Coastal Commission
Peter.Allen@coastal.ca.gov

Melissa Kraemer
California Coastal Commission
Melissa.Kraemer@coastal.ca.gov

Abbie Strickland
California Coastal Commission
Abigail.Strickland@coastal.ca.gov

Greg O'Connell
California Department of Fish and Wildlife
Gregory.OConnell@Wildlife.ca.gov

Corianna Flannery
California Department of Fish and Wildlife
Corianna.Flannery@Wildlife.ca.gov

Rebecca Garwood, Michael van Hattem
California Department of Fish and Wildlife
CEQACommentLetters@wildlife.ca.gov

Julia Krog
County of Mendocino
krogj@mendocinocounty.org

North Coast Regional Water Quality Control Board
Northcoast@waterboards.ca.gov

Response to NCRWQCB

1. It is understood that the NCRWQCB prefers an alternative that would minimize impacts to aquatic resources. The project is designed to reduce impacts to aquatic resources as feasible, and would include standard measures and BMPs, which minimize harms to wetlands, waters, and riparian areas. Compensatory mitigation will be implemented for permanent impacts to aquatic resources (see **AMM-BR-9**). Environmental impacts were considered in identifying the preferred alternative (Design Option 2B – East Arch); see Section 2.4, *Identification of a Preferred Alternative*, of the environmental document for more information.
2. As the comment notes, details on construction dewatering and water quality monitoring would be submitted to the NCRWQCB as part of the 401 Water Quality Certification process prior to construction. A Water Quality Monitoring Plan, which complies with the water quality objectives for the Albion River, would be prepared and approved prior to construction and implemented during construction.
3. To expedite the establishment of the Mendocino Coast Mitigation Bank, two banks are being proposed. Bank #2 would include locations adjacent to the Navarro River/estuary in the Navarro River Hydrological Unit Code 10. The Albion River Bridge Project is within the proposed service area for this bank and would therefore be able to use the bank. Caltrans will continue to work with the NCRWQCB and other agencies in relation to this bank and other potential mitigation options. In addition, Caltrans has analyzed impacts to aquatic resources and identified avoidance and minimization measures; see Section 3.4.2, *Wetlands and Other Waters,* of the environmental document for more information.
4. As noted by the NCRWQCB, off-site and out-of-kind mitigation for impacts to aquatic resources, if needed, would require higher mitigation ratios. Appropriate ratios for mitigation would be identified and in coordination with the NCRWQCB and other agencies in the permitting phase of the project.
5. It is understood that the NCRWQCB favors post-construction stormwater treatment on-site and in vegetated swales. Stormwater treatment would be located and sized in accordance with permit requirements and Caltrans design criteria. As stated in Section 3.3.2 of the ED, stormwater runoff from impervious roadway surfaces and bridge approaches would be discharged as sheet flow to biofiltration strips and/or biofiltration swales. Runoff from the bridge deck would be captured and routed from the bridge at the abutments and discharged to vegetated or rock-lined ditches. It is currently anticipated that all new impervious surfaces would be fully treated within the Environmental Study Limits. Additional detail on stormwater treatment would be developed in the design phase of the project, after completion of the final environmental document.

3.5 STATE LANDS COMMISSION

STATE OF CALIFORNIA — GAVIN NEWSOM, Governor

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

Established in 1938

JENNIFER LUCCHESI, *Executive Officer*
916.574.1800
TTY CA Relay Service: **711** *or Phone* **800.735.2922**
from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: 916.574.1900

September 9, 2024

File Ref: SCH #2015042016

Caltrans
Attn: Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

*VIA ELECTRONIC MAIL ONLY (*albionbridge@dot.ca.gov)

Subject: Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) Evaluation for Albion River Bridge Project, Mendocino County

Dear Liza Walker:

The California State Lands Commission (Commission) staff has reviewed the Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation (EIR/EIS) for the Albion River Bridge Project (Project), which is being prepared by the California Department of Transportation (Caltrans). Caltrans, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 *et seq.*). Caltrans is also the lead agency under the National Environmental Policy Act (NEPA) in accordance with a NEPA Assignment Memorandum of Understanding from the Federal Highway Administration (FHWA) (42 U.S.C. § 4321, *et seq.*). The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. The Commission will additionally act as a responsible agency because the Project involves work on State sovereign land.

Commission Jurisdiction and Public Trust Lands

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub.

Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All granted or ungranted tidelands and submerged lands, navigable lakes, and waterways are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the State for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the ordinary high water mark, which is generally identified as the mean high-tide line (MHTL), except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court.

The Albion River, at the Project location, is State sovereign land under the Commission's jurisdiction. On November 30, 1941, the Commission approved a right-of-way map (No. PRC 342) for the existing bridge pursuant to California Streets and Highways Code section 101.5. Based on the information provided, it appears the proposed Project will extend beyond the approved right-of-way. Therefore, authorization of a temporary construction easement from the Commission will be required for the Project, and authorization of a new permit and a new right-of-way map from the Commission may be required for the Project. An application may be submitted to the Commission through the online application portal (OSCAR.slc.ca.gov). If there are questions specific to jurisdiction, lease provisions, or the application process, please contact Public Land Manager Ninnette Lee (contact information below).

Project Description

Caltrans proposes to replace the existing Albion River Bridge (Caltrans Bridge #10-0136) on State Route (SR) 1 in Mendocino County from postmile (PM) 43.3 to PM 44.2. The purpose of the Project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The Project is needed to address several functional, safety, and structural deficiencies associated with the existing bridge. Correcting these deficiencies would improve safety for all users and reduce the chance of catastrophic bridge failure.

Caltrans evaluated three Build Alternatives and a No-Build Alternative (also known as the "No-Action" Alternative). The Draft EIR states that a preferred alternative for the Project will not be identified until after the Project's Draft EIR/EIS has been circulated and public and agency comments have been

considered. Per the Draft EIR, design Option 2B was determined to be the environmentally superior alternative.

From the Project Description, Commission staff understands that the Project would include the following components that have the potential to affect State sovereign land:

- Demolition and structural removal activities for the existing bridge
- Temporary equipment, falsework, and/or bridge removal trestles necessary for equipment, materials, and/or construction-worker access to the existing bridge and the replacement bridge
- Pier placement
- Embankment shoring

Environmental Review

Commission staff requests that Caltrans consider the following comments on the Project's EIR/EIS to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the Final EIR when considering a future lease application for the Project.

General Comments

1

1. Project Description: Due to the size of the Project area, details regarding activities on State sovereign land on the EIR/EIS figures are not distinguishable. Commission staff requests that a specific figure (or figures) showing the activities that will occur below the MHTL of the Albion River and an accompanying description of the activities be included in the Final EIR/EIS and submitted to the Commission with the permit application.

Climate Change

2

2. Sea Level Rise: A tremendous amount of State-owned lands and resources under the Commission's jurisdiction will be impacted by rising sea levels. With this in mind, Caltrans should consider discussing in the Final EIR/EIS if and how various Project components might be affected by sea level rise and whether "resilient" designs have been incorporated. At the Project area, the Albion River and its surroundings are generally in a low-lying, flood-prone area that will be affected by rising sea levels. Additionally, because of their nature and location, these lands and resources are already vulnerable to a range of natural events, such as storms and extreme high tides.

   Given the height of the proposed replacement bridge, sea level rise is unlikely to impact the bridge span; however, the impact of sea level rise on the location and design of the pier footings and the use of bank stabilization should be discussed in the EIR/EIS. Attention should be given to sea level rise

projections to ensure the structures' designs are sufficient to ensure function, safety, and protection of the environment over the expected life of the structure.

Governor Brown issued Executive Order B-30-15 in April 2015, which directs State government to fully implement the Safeguarding Plan and factor in climate change preparedness in planning and decision making. In addition, the State of California released the *2018 Update to the Safeguarding California Plan* in January 2018, to provide policy guidance for State decision-makers as part of continuing efforts to prepare for climate risks. The Safeguarding Plan sets forth "actions needed" to safeguard ocean and coastal ecosystems and resources as part of its policy recommendations for State decision-makers. When considering applications, Commission staff will (1) request information from applicants concerning the potential effects of sea level rise on their proposed projects; (2) if applicable, require applicants to indicate how they plan to address sea level rise and what adaptation strategies are planned during the projected life of their projects; and (3) where appropriate, recommend project modifications that would eliminate or reduce potentially adverse impacts from sea level rise, including adverse impacts on public access.

Cultural Resources

3

3. Title to Resources Within Commission Jurisdiction: The EIR/EIS should state that the title to all archaeological sites and historic or cultural resources on or in the tide and submerged lands of California is vested in the State and under the jurisdiction of the Commission (Pub. Resources Code, § 6313).

   Staff requests that the following statement be included in the EIR/EIS's Mitigation Monitoring and Reporting Program: "The final disposition of archaeological, historical, and paleontological resources recovered on State land under the jurisdiction of the California State Lands Commission must be approved by the Commission."

Recreation

4

4. Public Access: According to the EIR/EIS, there is no direct access to the Albion River from SR 1, due to steep slopes, and no deeded public access to the Albion River from other access points because they are on private property. However, the EIR/EIS also states "Access to the beach at Albion Cove is privately owned. The general public may access the beach free of charge during normal day-use hours if they do not park on private campground property and do not use the campground facilities." Please ensure the Final EIR/EIS clearly states if public access is possible at the Project location.

5

The EIR/EIS should include a section describing the potential for the Project to affect recreational uses and public access to the subject waterway, particularly in light of the Project's construction schedule. The EIR/EIS should discuss the recreational uses and access points in the Project vicinity, whether and to what extent these uses would be facilitated or disrupted by the Project, and what, if any, measures could be implemented to reduce any potential negative impacts. This discussion should also identify any safety measures Caltrans will put in place to ensure public safety for recreational activities. Measures could include a public notice and Project area signage provided in advance of the Project, notifying the public of any disruptions, or creation of alternate access points or use areas.

6

Pursuant to section 84.5 of the California Streets and Highways Code, during the design hearing process, full consideration of, and a report on, the feasibility of providing public access to the subject waterway is required to be provided. The report should consider the following:

- An assessment of public access needs at the Project location, in addition to a benefit analysis of public access alternatives, not alternatives to access.
- A description of existing public access points and facilities in the Project vicinity, including the existing condition of these resources and entity responsible for maintenance.
- An assessment of existing constraints and hazards that could make on-site public access infeasible.
- A feasibility assessment of proposed on-site public access infrastructure, such as construction of trails, stairs, parking areas, trash cans, restrooms, etc.
- If on-site public access is infeasible, a feasibility assessment of alternatives, such as improving existing public access in the Project vicinity or creating new public access points that could provide a means to access the subject waterway within the project vicinity.
- Environmental impacts of providing public access.
- A conclusion on the feasibility of providing public access.

If the report determines that public access is feasible, the EIR/EIS must reflect how public access improvements will be incorporated into the Project and identify any associated environmental impacts. Planning for preparation of the report should occur during the earliest stages of Project planning, and the report should be used to support the environmental impact analysis of the EIR/EIS. Because the Commission is acting as a responsible agency for purposes of its approval consideration, Commission staff will need to rely on the EIR by Caltrans to make a CEQA-based recommendation to the Commission on the Project. The Final EIR/EIS should, therefore, include the

requested analysis on feasibility of providing public access to avoid delays with Commission staff's processing of the application.

Thank you for the opportunity to comment on the EIR/EIS for the Project. As a responsible and trustee agency, the Commission will rely on the Final EIR/EIS for issuance of a new permit and right-of-way map as specified above (see Section "Commission Jurisdiction and Public Trust Lands"). Staff requests that Caltrans considers these comments before certifying the EIR/EIS.

7

Please send electronic copies of the Final EIR/EIS, Mitigation Monitoring and Reporting Program (MMRP), Notice of Determination, approving resolution, CEQA Findings, and, if applicable, Statement of Overriding Considerations when they become available. Please note that federal and State laws require all government entities to improve accessibility of information technology and content by complying with established accessibility requirements. (29 U.S.C. § 794d; 36 C.F.R. § 1194.1, *et seq.*; Gov. Code, § 7405.) State law prohibits State agencies from publishing on their websites content that does not comply with accessibility requirements. (Gov. Code, § 115467.) Therefore, any documents submitted to Commission staff during the processing of a lease or permit, including the MMRP and CEQA Findings, must meet accessibility requirements for Commission staff to place the application on the Commission agenda.

Please direct questions concerning environmental review to Cynthia Herzog, Senior Environmental Scientist, at cynthia.herzog@slc.ca.gov or (916) 574-1310. For questions concerning Commission leasing jurisdiction, please contact Ninnette Lee, Public Land Manager, at ninette.lee@slc.ca.gov or (916) 574-1869.

Sincerely,

Nicole Dobroski, Chief
Division of Environmental Science,
Planning, and Management

cc: Office of Planning and Research
C. Herzog, Commission
N. Lee, Commission
F. Pao, Commission

Response to State Land Commission

1. Maps and descriptions specific to activities within the State Land Commission's jurisdiction will be developed and submitted to the Commission after the final environmental document (ED) is released, during the permitting phase of the project. As noted in the summary of the project description in the comment letter, activities within the State Land Commission's jurisdiction for the identified preferred alternative, Design Option 2B (East Arch), include demolition and removal of the existing bridge and piers, and installation and removal of piles associated with the temporary trestles. No piers of the proposed structure sit below the ordinary high water mark (OHWM). The maps shown in Appendix J (Sensitive Habitat Impact Maps) do show impacts to resources below the mean high tide line.
2. Sea level rise was considered in the development of all Build Alternatives. Sea level rise is addressed in the ED in Section 4.5.5, *Adaptation*, which is under the discussion on climate change (Section 4.5, *Climate Change)*.
3. It is acknowledged that title to all archaeological sites, and historic or cultural resources on or in the tide and submerged lands under jurisdiction of the California State Lands Commission will rest with the Commission. There are no known surface artifacts identified and there is no plan to conduct any test excavations in these areas that would expose subsurface resources. It is further acknowledged, if any excavation in these areas is conducted during identification efforts or during construction, the final disposition of archaeological, historical, and paleontological resources recovered on State land under the jurisdiction of the California State Lands Commission must be approved by the Commission.
4. A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. The Public Access Feasibility Report and the ED identify that there is no deeded public access to the Albion River or the beach; all of the access points from land are on private property (see ED Section 3.2.5, *Parks and Recreational Facilities)*. The south bank/bluff slope and north slopes are steep and it would be impractical to provide access that is compliant with the Americans with Disabilities Act (ADA) within the Caltrans right of way. The public can access the Albion River through the privately-owned Albion Campground with a day pass or reservation of a campsite for a fee. Previously, the Albion River Campground website indicated that the general public was welcome to access the beach without charge during normal day-use hours if they do not park on private campground property and do not use the facilities. The other private access point, Schooner's Landing Marina, has previously provided river access, but is currently closed. On the south side of the river, self-propelled personal watercraft can be launched from a facility owned by Pacific Union College for a fee. However, the proposed project would provide a structure with a 75-year service life as well as widened shoulders and a pedestrian path which would ensure safe and reliable coastal access near the Albion River. Further, the project proposes to improve Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and

realigning the road. These changes would improve public safety and accessibility to the Albion Campground and Albion River.

5. The ED includes a description of recreational uses and access points in the project vicinity and the potential for the project to affect recreational uses to the Albion River in Section 3.2.5, *Parks and Recreational Facilities.* This section also describes Measure **AMM-PR-1**, which requires a public outreach program be implemented to notify the public and others with information regarding construction activities and closures.
6. A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. As noted in Response 4 above, it is not feasible to provide public access within the Caltrans right of way.
7. Comment noted. The State Lands Commission is included on the distribution list for the project.

3.6 U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 9
SAN FRANCISCO, CA 94105

September 9, 2024

Liza Walker
Environmental Branch Chief, North Region Environmental
California Department of Transportation, District 1
1656 Union Street
Eureka, California 95501

Subject: EPA Comments for the Albion River Bridge Project Draft Environmental Impact Report/Environmental Impact Statement, Mendocino County, California (EIS No. 20240118)

Dear Liza Walker:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act. Our review and comments are pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires the EPA to review and comment on the environmental impact on any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The combined Draft Environmental Impact Report and Environmental Impact Statement prepared by Caltrans proposes to replace the existing Albion River Bridge located on State Route 1 in Mendocino County. The new bridge will meet modern seismic safety standards, provide multimodal access, and minimize ongoing maintenance costs. The Draft EIR/EIS analyzes one No Build and three Build Alternatives, which respectively position the replacement bridge near or along the same alignment of the existing bridge. Since the Draft EIR/EIS indicates that a preferred alternative will be identified in the Final EIS/EIS, the EPA recommends that Caltrans provide a public comment period upon release of the final document and prior to issuance of a Record of Decision.

1

Review Summary

The EPA did not identify significant public health, welfare, or environmental quality concerns to be addressed in the final EIS. We are providing the following recommendations to improve the mitigation of wetlands losses and minimize community impacts.

2

Wetlands Resources

The EPA notes that Caltrans will require a Clean Water Act Section 404 Nationwide permit for the proposed project, as stated on page 342 of the Draft EIR/EIS. The EPA appreciates Caltrans' commitment to mitigation measure AMM-BR-9 to pursue off-site restoration to offset permanent losses of wetlands and water habitats

that cannot be restored or replaced onsite. As stated on page 347, Caltrans aims to offset losses through the use of credits from Mendocino Coast Mitigation Bank. However, Section 404 permits are subject to the issuance of a Clean Water Act Section 401 water quality certification and, based on the most recent Draft Bank Enabling Instrument (DBEI) submitted for the preferred bank, the project location is not within the service area for Section 401 credits provided by Mendocino Coast Mitigation Bank.

> ***Recommendations***: The EPA recommends that Caltrans continue to coordinate with Resource Environmental Solutions, LLC, who submitted the DBEI, regarding Mendocino Coast Mitigation Bank's most updated service area. The EPA also recommends that Caltrans contact the North Coast Regional Water Quality Control Board to explore additional mitigation opportunities, since Section 401 credits from Mendocino Coast Mitigation Bank may not be applicable for this project.

Community Impacts

3

The EPA notes that construction of all Build Alternatives will have the potential to cause transportation impacts to vulnerable members of the resident community. During the construction phase, the Build Alternatives would require between 165 and 945 days of traffic control days, occasional intermittent closures, and an extended overnight closure. We recognize that emergency vehicles would be allowed to cross the bridge during closures, and all vehicles would be allowed to cross the bridge in the event of an evacuation. Further, public outreach would be conducted to inform the community of the construction schedule, closures, detours, and work conducted, as specified by Standard Measure TT-3. However, as Table 12 in Section 3.2.6 shows, 40% of the area population is over the age of 65. In addition, an analysis of the project area using the EPA's EJScreen mapping tool indicates that high levels of health disparities, including high incidences of heart disease, cancer, and disabilities, as well as additional barriers such as transportation access burden, limited English, and broadband services gaps, exist in the resident population.[1]

> ***Recommendations***: Since the resident population has vulnerabilities that may necessitate urgent travel or require advanced travel planning, the EPA recommends that Caltrans develop targeted strategies to ensure that construction and closure information is conveyed in a timely manner to all members of the community. We also recommend that Caltrans include these outreach commitments in the Final EIR/EIS.

We appreciate the opportunity to review this Draft EIR/EIS and are available to discuss the enclosed comments as Caltrans prepares a Final EIR/EIS. When the Final EIR/EIS is released for public review, please provide the EPA with an electronic copy, or send information about how to access the document online. If you have any questions, please contact me at donez.francisco@epa.gov, or contact Ting-Sheng Liao, the lead reviewer for this project, at (415) 972-3558 or liao.ting@epa.gov.

Sincerely,

FRANCISCO DONEZ

Digitally signed by FRANCISCO DONEZ
Date: 2024.09.06 08:08:14 -07'00'

Francisco Dóñez
Manager, Environmental Review Section 2

[1] U.S. Environmental Protection Agency. (2024, July 10). EJScreen: Environmental Justice Screening and Mapping Tool. https://ejscreen.epa.gov/mapper/

Response to U.S. EPA

1. There will be a public review period of 30 days following publication of the Final EIR/EIS. Any substantive comments received on the Final EIR/EIS will be identified and responded to in the Record of Decision (ROD).
2. Caltrans will continue to work with RES regarding the Mendocino Coast Mitigation Bank and the associated service area. Caltrans is coordinating with the NCRWQCB related to the mitigation bank, as well as any other mitigation opportunities. See also the response to Response 3 for the NCRWQCB in Section 3.4 of this document.
3. Traffic control proposed for the Albion River Bridge Project is standard, similar to traffic control associated with other Caltrans projects. See Master Comment 8 (Traffic and Emergency Response) for more detail on traffic and emergency response associated with the project. Other than one overnight closure, timed to cause the least disruption to the public, traffic control would only require minor delays to the traveling public and is not anticipated to necessitate major changes to urgent travel or travel planning. The identified preferred alternative, Design Option 2B (East Arch), is estimated to have 305 days of traffic control, with 205 flagging days and 100 temporary signal control days—based on worst case scenarios, flagging can have delays of up to 15 minutes, and temporary signal systems typically have delays up to 5 minutes, though total delays are likely to be shorter at off-peak times. In addition, as acknowledged in the comment, the project would include Standard Measure **TT-3**, which includes public notifications of planned closures. These notifications typically are through a variety of sources such as the lane closure system, which populates the Caltrans QuickMap, in addition to social media, press releases, and signage along the highway. No additional measures would be needed. See Master Comment 7 (Traffic and Emergency Response) for more detail on traffic and emergency response associated with the project.

3.7 ADVISORY COUNCIL ON HISTORIC PRESERVATION

From: Rachael Mangum
To: Walker, Liza M@DOT
Cc: albionbridge@DOT; Emily Choi
Subject: FW: [External] Albion River Bridge Project Notice of Availability
Date: Friday, July 12, 2024 2:01:07 PM
Attachments: Albion Public Notice Ad.pdf

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi Liza,

1

I am following up on your email to the ACHP general mailbox. Did you attempt to send the original message on Monday to our e106@achp.gov email address? That is the mailbox used for all submissions to the ACHP using the e106 form with supporting documentation to notify us of an adverse effect finding or efforts to develop Section 106 Programmatic Agreements. We ask that agencies not use the achp general mailbox for any notifications related to the Section 106 process.

The notification below references development of an Environmental Impact Statement for the project. Our comments were requested regarding the National Environmental Policy Act (NEPA) review. We have no comments pursuant to NEPA at this time.

The ACHP encourages the California Department of Transportation (CalTrans) to initiate the Section 106 process by notifying, at your earliest convenience, the California State Historic Preservation Officer (SHPO), Indian tribes, and other consulting parties pursuant to 36 CFR § 800.3 to ensure compliance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). Through early consultation, your agency will be able to determine the appropriate strategy to ensure Section 106 compliance for this project. The regulations (at 36 CFR § 800.3(b)) specifically encourage federal agencies to coordinate their Section 106 review with other required environmental reviews, such as NEPA, in order to reduce duplicative analyses and overlapping review periods.

CalTrans should continue consultation with the SHPO, Indian tribes, and other consulting parties to identify and evaluate historic properties and to assess any potential adverse effects on those historic properties. If you determine, through consultation with the consulting parties, that the undertaking will adversely affect historic properties, or that the development of a Section 106 agreement document (Agreement) is necessary, CalTrans must notify the ACHP and provide the documentation detailed at 36 CFR § 800.11(e). In the event that this undertaking is covered under the terms of an existing Agreement, you should follow the process set forth in the applicable Agreement.

Should you have any questions or require additional assistance, please contact Ms. Emily Choi at (202) 517-0207 or by e-mail at echoi@achp.gov.

Sincerely,
Rachael

Rachael Mangum, MA, RPA
Assistant Director
Federal Permitting, Licensing, and Assistance Section

Advisory Council on Historic Preservation
(202) 517-0214
rmangum@achp.gov

From: Walker, Liza M@DOT <liza.walker@dot.ca.gov>
Sent: Friday, July 12, 2024 4:22 PM
To: achp@achp.gov
Cc: albionbridge@DOT <albionbridge@dot.ca.gov>
Subject: [External] Albion River Bridge Project Notice of Availability

Good afternoon.

I sent an e-mail on Monday morning letting you know that the California Department of Transportation has prepared a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and Draft Section 4(f) Evaluation, which examines the potential environmental impacts for the proposed Albion River Bridge Project located on State Route 1 in Mendocino County between post miles 43.3 through 44.2. It appears the e-mail was possibly not received due to firewall issues, so I wanted to be sure to follow up.

The draft EIR/EIS describes why the project has been proposed, the alternatives considered, how the existing environment could be affected, the potential impacts of the alternatives, and the proposed avoidance, minimization, and/or mitigation measures. The draft environmental document can be found at the following website:

Albion River Bridge Project (ca.gov)

The environmental document is circulating publicly between July 8 and September 9, 2024. A public meeting will be held on Tuesday, August 13, 2024, from 6:00 p.m. to 7:30 p.m. at the Whitesboro Grange at 32510 Navarro Ridge Road in Albion. See the attached Notice of Availability for more information. Comments must be submitted by mail or e-mail by September 9, 2024. Comments can be submitted by e-mail at albionbridge@dot.ca.gov. or via mail at Caltrans, Attn: Liza Walker, 1656 Union Street, Eureka CA 95501.

Technical studies are available at the project website included in the attached public notice or can be requested via e-mail. You may also contact Katie Everett, Caltrans Project Manager, at katie.everett@dot.ca.gov or (707) 684-6998 if you have any questions or need additional information about the proposed project.

Thanks,

Liza Walker, Eureka Office Chief
North Region Environmental
(707) 502-9657 (cell)

Response to Advisory Council on Historic Preservation

1. Caltrans is following the Section 106 process. Cultural resources and the Section 106 process are discussed in the environmental document in Section 3.2.11, *Cultural Resources*.

Chapter 4. Organization, Business, and Other Group Comments

4.1 Albion Bridge Stewards

ALBION BRIDGE STEWARDS

By Electronic Mail
albionbridge@dot.ca.gov

September 9, 2024

Caltrans
Attn.: Liza Walker, Chief
Eureka Office, Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

RE: COMMENTS ON CALIFORNIA DEPARTMENT OF TRANSPORTATION "ALBION RIVER BRIDGE PROJECT" DEIR/S (SCH # 2015042016) – *RECEIPT CONFIRMATION REQUESTED*

Dear Ms. Walker,

The Albion Bridge Stewards appreciate this opportunity to comment on the California Department of Transportation's (Caltrans) unfortunately bloated and self-serving draft Environmental Impact Report and Environmental Impact Statement (DEIR/S, dated June, 2024) on Caltrans'

- *pretended but unsettled*, and,
- in passing *disclosed proposed*

"Albion River Bridge project" to unnecessarily and infeasibly replace the existing safe, functional, iconic, State- and Federal-listed historic, and primarily timber Albion River Bridge (Bridge, #10-0136). The Caltrans project has a currently (incompletely) estimated cost of $126 million to $155 million (DEIR/S, page 51)[1] – and likely, given the repeatedly bungled multi-decade history and ballooned Project costs - considerably more.

1

The existing Bridge is a highly valuable and highly valued asset in Albion, Mendocino County, California, the United States, and by many international visitors to this environmentally sensitive coast. Preservation (in Caltrans-speak, "rehabilitation") of the

2

[1] All references herein to pagination are to the electronic form of the DEIR/S. **Exhibit 1**, below, lists the component parts of the electronic and printed formats of the DEIR/S by title and page length, and also lists their respective Caltrans web site page addresses. (All exhibits are appended to the end of this comment letter.)

Bridge constitutes the only context-consistent, environmentally superior, economically and taxpayer responsible, feasible, and legally available alternative, as further discussed below.

3

By contrast, the DEIR/S engages in a CEQA/NEPA-inconsistent procedural slight-of-hand that boldly asserts, on the one hand, that it defers Caltrans' proposed specific (finite) development project (preferred alternative or Final Alternative) for threshold public environmental review from the DEIR/S to the Final EIR/S, after the public comment period on the DEIR/S has long tolled and Caltrans can be reasonably expected to again assert its not-inconsequential bureaucratic weight inside the California executive branch regulatory agencies, that variously derive funding from Caltrans pursuant to stipulated performances under color of "Interagency Agreements" [that the DEIR/S also does not produce]).[2] On the other hand, the DEIR/S in Figure 33 (perhaps inadvertently) represents the proposed new Bridge "project location" – here for visual quality analysis – to be in the "Build Alignment 1" (West Alignment) that is further illustrated (e.g.) in DEIR/S Appendix J, "Sensitive Habitat Impact Maps".

1. Summary. The DEIR/S, although bloated to 2,991 pages that are laden with errors, omissions, misrepresentations, and frequently indecipherable graphics, fails to:

4

- Document that Caltrans has afforded the required substantive opportunities for early and continued participation in Project formulation, design, and investigation of feasible, environmentally superior (less damaging) alternatives to the Albion Bridge Stewards, other stakeholders in Albion and other impacted communities, and the public;

5

- Demonstrate that Caltrans has performed all required antecedent specific environmental, cultural, traffic, and community studies necessary for preparation of the substantively complete and accurate environmental information document;

6

- Identify any valid purpose and need for replacement of the Bridge;

- Substantively consider the only feasible (legally available) project in the context of its setting, which consists of preservation of the Bridge through proper maintenance, repair, completion of seismic upgrades, historic structure-consistent walk/bike way and drainage enhancements, and "Historic

[2] See, e.g., the Caltrans administrative record in Albion River Bridge precursor Coastal Development Permit 1-16-899 (Albion River Bridge Geotechnical Investigation).

Bridge" signage;

7

- Present an accurate, complete, internally consistent, and settled (finite) description of the feasible, environmentally preferred (least environmentally damaging) proposed project (and any feasible alternatives) in clear and unambiguous text, legible to-scale map, plan, elevation, and section drawings, rectified and dated aerial photographic imagery, photo-origination point- and date-specified at grade photographic imagery, graphic simulations, and relevant tabular data;

8

- Accurately and completely describe all baseline environmental and community conditions in all project development and operation (and project alternative) impact areas, including in relation to preceding, current, and reasonably foreseeable development projects in them;

9

- Analyze the finite feasible, environmentally preferred proposed project (and any feasible alternatives) for their direct, indirect, and cumulative (significant) impacts on the environment and all impacted communities, including, but not limited to, from previous Caltrans destruction, significant deterioration, or previously required but unperformed mitigation measures regarding sensitive environmental areas and species in the project area;

10

- Identify and present enforceable site-specific spatial, temporal, and performance commitments for avoidance, amelioration, and in-location and in-kind compensatory mitigation measures that will reduce all potential project impacts; and,

11

- Present a valid CEQA and NEPA environmental document, on which Caltrans or any other public agency may rely to take any action to approve, or conditionally approve, disclosed proposed "Albion River Bridge project" Alternative 1 (in either its "Option 1A" or "Option 1B" forms) or any other "Build Alternative" that the DEIR sets forth.

12

2. Request. A substantial controversy exists over Caltrans' "Albion River Bridge project" and the DEIR/S on it. The Albion Bridge Stewards respectfully request Caltrans to:

- Withdraw the failed DEIR/S;

- Engage constructively (rather than *pro forma*) with the Albion Bridge Stewards, other stakeholders, and the public to scope, discuss, and design the

only feasible and environmentally superior Bridge project - *which consists of its long-term preservation of the iconic, and historic Albion River Bridge, and its lower Albion River Valley setting, through Bridge, environmental, and community context-appropriate maintenance/repair and enhancements*; and,

- Cooperatively and inclusively prepare a new environmental document (or, if practicable, a supplemental DEIR/S) on the only feasible, environmentally superior Albion River Bridge Preservation-Rehabilitation Project for public and public agency review and comment, prior to any Caltrans or public regulatory agency action on it.[3]

- According to a schedule that recognizes both the importance of public agency efficiency and the right of the Stewards, other stakeholders, and the public to a fair hearing, provide for full opportunities for review of and substantive comment on the Supplemental DEIR/S - in our Broadband-limited area- that is clear, well organized, to the maximum extent free of transportation jargon, unbiased and objective rather than a shill for Caltrans, as concise as possible, with clearly, understandable graphics, and printed on quality recycled paper.

13

If Caltrans were to continue with the errand DEIR/S on the disclosed proposed Project in the alignment of Build Alternative 1 (or any of the other "build alternatives"), we respectfully request that Caltrans do the following, preparatory to production of a Supplemental DEIR/S and any action on it:

- Designate the Albion Bridge Stewards as a participating consulting party, pursuant to 36 US Coder of Federal regulations Part 88.3(f)(3) in all matters that relate to any National Historic Preservation Act section 106 proceedings regarding the removal, replacement, maintenance, repair, seismic retrofitting, pedestrian or bikeway enhancement, road deck storm drain enhancement, and/or rehabilitation (collectively, "undertaking') of the Federal and State-listed historic Bridge, as previously requested in our letter to Caltrans project manager Katie Everett, P.E., dated August 20, 2024, to which we have as of this date received no reply.

[3] The DEIR/S declares that Caltrans has prepared it, in relevant parts pursuant to NEPA and other federal laws, under delegation from and by the US Federal Highway Administration (FHWA). However, that declaration does not relieve the FHWA of its responsibilities pursuant to NEPA, the Federal Coastal Zone Management Act, the Federally-approved California Coastal Management Program, and other applicable laws in this case.

- Fully notice a substantive Supplemental DEIR/S scoping meeting and comment period to all stakeholders, the public that may be impacted by construction and operation of Build Alternative 1, the environmentally superior Bridge rehabilitation-preservation alternative, or any of the other "build alternatives"), and to all applicable (including, responsible) public agencies.

- Present a detailed quantified structural, operational, and budgetary assessment of all previous Bridge maintenance, repair, and seismic retrofit recommendations by Caltrans bridge inspectors that have and have not been implemented, with a budget for implementation of the latter, for Bridge enhancement with a cantilevered walk/bikeway and a sustainable road deck drainage system, and for regular inspection and maintenance of the preserved Bridge. **Exhibit 4** contains architect and Albion Bridge Steward John Johansen's drawing (used by permission) in cross-section of a potential design for the location of historical Albion River Bridge-compatible 6-foot wide cantilevered pedestrian/bicycle ways on the west and east sides of the Bridge, with relocated (outboard) iconic Bridge timber railings and new steel tube traffic barriers similar to those on the Noyo River Bridge.

- Present an accurate and complete baseline description and analysis of the environmental and community conditions and trends in the proposed Project impact area(s), the environmentally superior Bridge rehabilitation-preservation alternative project area, and any retained "build alternatives" project areas.

- Present an accurate and complete description, with legible to-scale concept (15%) construction plans, and other relevant graphics, of all construction and Bridge removal, associated impacts on the environment and impacted Communities from the proposed specific (when finite) Albion River Bridge project Alternative 1, the environmentally superior Bridge rehabilitation-preservation alternative, and any retained "build alternatives".

- Present an accurate and complete constraints/consistency analysis, including, but not limited to, an analysis of CEQA § 21061.1 feasibility and compliance with (a) CEQA, (b) NEPA, and (c) all applicable mandatory State of California and Federal development standards, of the proposed specific (when finite) Albion River Bridge project Alternative 1, the environmentally superior Bridge rehabilitation-preservation alternative, and any retained "build alternatives".

- Present a complete, authorized as applicable, funded, and enforceable

5

Albion Bridge Stewards Comments, CT Albion River Bridge
Project DEIR/S (6/2024), September 9, 2024

monitoring, reporting, and adaptive mitigation program, with specified relevant quantified performance standards, to reduce all identified potentially significant (adverse) direct, indirect, and cumulative effects (impacts) from the proposed specific (when finite) Albion River Bridge project Alternative 1, the environmentally superior Bridge rehabilitation-preservation alternative, and any retained "build alternatives" on the environment and impacted communities.

- Establish and maintain current a published schedule for completion of the Supplemental DEIR/S, fully notice and conduct a local public hearing in a Covid-19 safe venue on it (rather than the *pro forma* "public meeting" on the DEIR/S on August 13, 2024 that Caltrans arbitrarily and summarily ended when over 150 persons were present and the first 30 of them had already requested to be recognized to testify, but were not allowed to do so), and a reasonable amount of time for review and comment on the Supplemental DEIR/S.

3. Background. The 969-foot long, 28.5 foot wide, well-designed and built, primarily timber Albion River Bridge carries emblematic California Coast Highway 1, with an estimated relatively low average daily traffic volume of ±3,000 trips, over the wild and scenic Albion River in rural, quiet, environmentally sensitive, and designated/mapped high scenic Albion, coastal Mendocino County, California.

14

Exhibit 2, hereto, contains an aerial photograph[4] that depicts the baseline location of the existing linear (not curvilinear, as the DEIR/S erroneously states) Bridge in its environmental and nearshore coastal community setting. The references in the DEIR/S to the existing Bridge's being "curvilinear" reflect an uncritical interpretation of the appearance of the Bridge in unrectified aerial photographic imagery, and are void.

15

Between the steep, geologically fragile, and (baseline) environmentally sensitive habitat North- and South-facing Albion River Bluffs, the Bridge spans the State-protected wild and scenic (classified "recreational") Albion River (pursuant to the California Wild and Scenic River Act [PRC § 5093.50 et seq.),[5] (b) the Albion Flat historical lumber mill site,

[4] The aerial photograph is from 2015, prior to Caltrans' latest unmitigated scalping of numerous trees during 2018-2019 of County LCP-designated and -mapped sensitive Osprey nesting habitat on the northwesterly side of the Bridge that conveniently happens to be in the curvilinear alignment of the proposed (Figure 33) relocated north approach of Highway 1 to the "Build Alternative 1" replacement bridge alignment.

[5] The California "recreational" wild and scenic classification of the Albion River reflects its status as a river, or here the lower 3.9 mile-long river segment, that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

(c) the underlying Albion Flat hyporheic zone (gravel beds through which entrained tardigrades ["water bears", "moss piglets"] in subterranean flow lines of the River are mobilized into the lower Albion River Estuary, where they serve as a key food source for juvenile (listed sensitive) Coho Salmon and Steelhead prior to their outmigration into the Pacific Ocean), and (d) the is proximate to precedent Indigenous American cultural sites.

The California Wild and Scenic Rivers Act requires that, here, the Albion River (PRC § 5093.54[h]) - together with its immediate environments - shall be preserved in its free-flowing state, for the benefit and enjoyment of the people of the state, and that such use of the river constitutes the highest and most beneficial use of water, and is a reasonable and beneficial use of water, within the meaning of California Constitution Article X, Section 2. The designation applies to the Albion River "from one-fourth mile upstream of its confluence with Deadman Gulch downstream to its mouth at the Pacific Ocean" (Id.). The Caltrans-proposed Alternatives 1A and 1B propose downcoast bridge foundation and one or more associated construction coffer dams, trestles, and shading of existing Albion River eel grass beds that do not constitute allowable uses in/of the wild and scenic Albion River.

16

Exhibit 3 contains a facsimile of Caltrans' own legible topographical map (2016) of the Bridge and adjacent areas – that the DEIR/S prejudicially altogether omits.

17

All attempted Caltrans fear mongering aside, Caltrans bridge inspectors and other Caltrans staff have repeatedly informed the Albion Bridge Stewards, other stakeholders, and the public that the existing iconic, historic Bridge has no weight (load) limits and is safe for use. Repeated generalized speculation in the DEIR/S about the Bridge's performance under generic, unquantified and unexamined, events flies in the face of the Bridge's successful, resilient 80-year history on the inland side of semi-sheltered Albion Cove (by the North Albion and South Albion headlands, as well as the local bathymetry), during which no seismic event, no tsunami, and no storm surge has resulted in any bridge inspection-reported significant damage to the Bridge piling foundation, piers, steel truss, timbers, road deck, or iconic railings. When a fully loaded log truck took out a section of the east railing and X-bracing timbers of Bents 9-10 below it in 2002, Caltrans reopened the substantially overbuilt Bridge within some three (3) hours to traffic and expeditiously repaired the damage, such that the next bridge inspection report did not even consider it necessary to mention it.

18

In addition, Caltrans' own Bridge inspection reports (which the DEIR/S selectively references, but neglects to produce) repeatedly document that inspector-recommended maintenance, repairs, and enhancements of the Bridge, when completed, result in subsequent "Fair" (and in some cycles, "Good") ratings of the relevant Bridge components

and of the entire Bridge. We applaud the intrepid Caltrans maintenance workers and others who have professionally and with care worked to protect this grand California asset, and maintain and repair it.

With enactment of California Senate Bill 5 (Ch. 5, Stats. 2017) and the Federal Infrastructure Investment and Jobs Act (Public Law No. 117-58, 2021), the money is now available for prioritized maintenance, completion of deferred repairs, and historic bridge structure-appropriate enhancement of the significant transportation asset that is the iconic Albion River Bridge.

Rather than being an active party to its benign neglect, we urge Caltrans to maintain the existing Bridge for its continued safe and sustained use through cultivated excellence, environmental stewardship, support of community values, livability, and equity, enhancement of the multimodal transportation system in Albion and coastal Mendocino County, and transparent, effective, and efficient iconic transportation asset management.

19

4. CEQA Requirements. Pursuant to CEQA, (a) the maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern; (b) it is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of humans; (c) there is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of its natural resources; (d) the capacity of the environment is limited, and the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached; (e) every citizen has a responsibility to contribute to the preservation and enhancement of the environment; (f) the interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution; and (g) it is legislative intent that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies that are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

CEQA defines the term "environment" to mean the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.
In addition, it is the policy of the State of California to (a) develop and maintain a high-quality environment now and in the future, and take all action necessary to protect,

8

Albion Bridge Stewards Comments, CT Albion River Bridge
Project DEIR/S (6/2024), September 9, 2024

rehabilitate, and enhance the environmental quality of the state; (b) take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise; (c) prevent the elimination of fish or wildlife species due to human activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history; (d) ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions; (e) create and maintain conditions under which humans and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations; (f) require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality; and (g) require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

20

CEQA requires preparation of an EIR (1) where, as here, there is substantial evidence, in light of the whole record before Caltrans (acting as the economically self-interested and hence fundamentally conflicted lead agency), that the project may have a significant effect on the environment, an environmental impact report shall be prepared, and (2) to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.

CEQA defines (1) 'project' to mean an activity that may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following: (a) an activity directly undertaken by any public agency; (b) an activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies; (c) an activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies, and (2) 'feasible' to mean capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

Further, it is the policy of the State of California that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public

agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects, subject to a legislative finding and declaration that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved despite their having one or more significant effects.

Clarifying amendments to CEQA (1994) in relevant part to the DEIR/S state legislative intent that (1) environmental documents be organized and written in a manner that will be meaningful and useful to decision-makers and to the public, and (2) it is the policy of the State of California that noncompliance with CEQA's information disclosure provisions that precludes relevant information from being presented to the public agency, or noncompliance with substantive requirements of CEQA, may constitute a prejudicial abuse of discretion, regardless of whether a different outcome would have resulted if the public agency had complied with those provisions.

5. NEPA Requirements. Pursuant to NEPA, Caltrans is required to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.

To that end, it is Caltrans' delegated responsibility to contribute to the preservation and enhancement of the environment through (1) acting as a trustee of the environment for succeeding generations; (2) assuring safe, healthful, productive, and esthetically and culturally pleasing surroundings for all Americans; (3) attaining the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; (4) preserving important historic, cultural, and natural aspects of our national heritage, and maintaining, wherever possible, an environment which supports diversity and variety of individual choice; (5) achieving a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and (6) enhancing the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

6. Caltrans has identified no valid purpose or need in the DEIR/S for replacing the Bridge.

21

6.1. The DEIR/S identifies no valid purpose based on substantial evidence, or analysis of substantial evidence, in the disclosed record for either (a) the claimed "Albion River Bridge project" "five alternatives" ("options"), or (b) the located but otherwise unspecified project West of the existing Bridge depicted in DEIR/S Figure 31.

In sequence, the Abstract in the DEIR/S merely states that "(t)he purpose of the proposed project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs." However, the DEIR/S neither presents nor analyzes any "modern seismic safety standards", fails to consider the cantilevered public walk (and possibly, bike) way from the existing Bridge that Dr. Brungraber considered to be feasible, and contains no comparative data or analysis of "ongoing maintenance costs" for either the existing Bridge or Caltrans' alternately disclaimed and identified West alignment replacement bridge.

The DEIR/S simply repeats the statement of purpose in the Abstract on eP 7, eP 8, eP 54, - all without any presentation of, analysis of, or reference to, any relevant substantial evidence.

22

6.2. The DEIR/S Identifies No Valid Purpose (Objective) for the Unsettled "Albion River Bridge project" or the Figure 33 "Build Alternative" on the West side of the existing Bridge. DEIR/S part 1.4.1. (page 54) presents ten (10) project "objectives", as follows:

• Eliminate of the bridge's structural and seismic deficiencies, notwithstanding that the DEIR/S contains (a) no substantial evidence, analysis of substantial evidence, or reference to substantial evidence regarding any specific significant deficiencies in existing Bridge structural elements (components), and (b) no substantial evidence, analysis of substantial evidence, or reference to substantial evidence regarding any specific significant deficiencies in existing Bridge structural elements (components) in relation to any design seismic event in the area of the existing bridge.

As noted *infra*, the DEIR/S also (c) neither sets forth nor analyzes any controlling structural standards and "modern seismic safety standards" that apply to the existing Bridge, and (d) provides no explanation regarding any reasons for why the seismic retrofitting of the existing Bridge, recommended by prior bridge inspection reports, has not been completed. The first objective for replacing the existing bridge thus fails for lack of identified requisite specificity, relevance, and acknowledgment that completion of the half-done seismic retrofit would likely place the existing Bridge's ratings in this context into at least a "Fair" condition.

23

Second, eliminate the truss main span's fracture critical condition. The DEIR/S' syntax here is misleading: prior FC inspections of the existing Bridge's steel truss have identified no subject failures or a fracture critical "condition"; like the Golden Gate Bridge and others, the existing Bridge steel truss members do not have redundant riveting, and therefore require regular inspection of the categorical "fracture critical" steel components.

24

Third, provide shoulder widths consistent with local coastal plan requirements. The DEIR/S misstates County LCP Coastal Element Policy 3.8-6, which sets forth a goal – to

be harmonized with other California Coastal Act and LCP objectives – rather than a "requirement".[6]

25

Fourth, provide improved road alignment and sight distance. The DEIR/S (e.g., on page 217) misinterprets erroneous (unrectified) aerial imagery of the existing Bridge to characterize it as having a curvilinear alignment, when in fact the alignment of the Bridge is rectangular and straight, as shown on Caltrans' own topographical map (reproduced in Exhibit 2). No replacement of the existing Bridge is necessary to accomplish a feasible gentler curve at the upcoast T-intersection of Highway 1 with North Side Albion River Road and Albion-Little River Road.

26

Fifth, provide safe, multimodal bridge access for bicyclists and pedestrians. The existing Bridge does not require replacement to achieve this purpose; the historical structure-congruent cantilevered walk and bike way from the existing Bridge would serve that purpose, especially if Caltrans were to connect it by completing the California Coastal Trail through Albion and connecting it to improved crossing safety at the Highway 1 T-intersections with Albion-Little River Road, Albion Ridge Road, and Spring Grove Road (all of which are located between Highway 1 PM 43.3 and PM 44.2).

27

Sixth, minimize ongoing maintenance costs. The DEIR/S presents no substantial evidence, reference to substantial evidence, or analysis of substantial evidence about the 75-year maintenance costs of either the West alignment of the concrete bridge replacement project (including its unquantified concrete retaining walls, concrete barrier slabs, concrete foundation elements, concrete abutments, concrete spans, and concrete-backfilled sawcut foundation elements of the existing Bridge, or of any of the other four concrete "build alternatives", which renders comparative minimization of costs relative to properly performed, previously deferred, and future maintenance of the existing historic Bridge unavailable and accomplishment of this relative (comparative) purpose speculative.

28

Seventh, minimize traffic delays associated with bridge inspection, maintenance, and repairs. The DEIR/S presents no comparative substantial evidence, reference to substantial evidence, or analysis of substantial evidence regarding (a) actual one lane or two lane traffic delays on the existing Bridge and Highway 1, Albion Ridge Road, Spring Grove Road, North Side Albion River Road, and Albion-Little River Road approaches from inspection, maintenance, and repairs of the existing Bridge since its opening to traffic in 1944, (b) a quantified work day-specific (early morning to night-time) Traffic Management Plan schedule for delays associated with reversing one lane closures and "as needed" two lane closures, and (c) delays associated with construction equipment, materials, and worker traffic on Highways 1, 128, 20, and on Albion Ridge Road, Spring Grove Road, South Side Albion River Road, North Side Albion River Road, and Albion-Little River Road

[6] See, https://www.mendocinocounty.gov/home/showpublisheddocument/56978/638167184738370000, page 122.

during 4 (to 6, in Alternative 3A) years of new Bridge construction/deconstruction, with renders this this implied comparison speculative.

29

Eighth, improve resilience to sea level rise, storm surges, and tsunamis. The DEIR/S utilizes outdated (2018) and now disclaimed California Ocean Protection Council sea level ("rise") projections based on water level data from NOAA Station 9416841, an open ocean (Arena Cove Pier) tide gauge, the location of which differs substantially from semi-sheltered inner Albion Cove. In contrast to the DEIR/S's "projections" (technically, scenarios) of 1-foot and 7-foot sea level rise through 2100, NOAA's current (2024) relative sea level trend for Station 9416841 is 1.08 mm ± 0.83 mm/yr, with a confidence level of 95%, which equates to a water level change (rise) of 0.35 feet in 100 years. (See, https://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?id=9416841.) NOAA's Annual Mean Relative Sea Level Since 1960 and Regional Scenarios, 9416841 Arena Cove, California (after the 5th National Climate Assessment, 2022), range between a low increase in water level of ±0.8 feet and ±6.3 feet by 2100.

However, Caltrans and its consultants since 1999, when Caltrans initially contemplated "replacement/rehabilitation" of the existing Bridge, did not (a) measure trends in actual water levels either in inner Albion Cove or in lower Albion River at Albion Flat, (b) analyze how Caltrans' inappropriate removal with mechanized equipment in 2017 of part of the historic Albion Lumber Mill bulkhead and forward Albion Flat dunes facing Albion Cove Beach, under false color of an archeological investigation, changed relevant topographic baseline conditions in the LCP-classified dune Environmental Sensitive Habitat, and (c) consider feasible alternatives for protecting the existing Bridge pier structures at such time in the future as when climate change-driven sea levels may threaten them with scouring or other marine erosion. Notably, the DEIR/S does not propose to remove the foundational elements of the existing Bridge, but instead proposes to saw cut them three (3) feet below extant grade and fill the hole in the dunes and north-/south-facing Albion River bluffs with concrete.

30

Ninth, prevent further preservative treatment leaching from existing bridge timbers. The DEIR/S contains no site-specific data or analysis of any current leaching of chemicals from Douglas Fir timbers in the existing Bridge that were Wolmanized (treated for preservation) in 1942-1943, which renders this "Albion River Bridge project" purpose speculative and not substantial evidence in support of removal and replacement of the existing Bridge.

31

Tenth, minimize construction-related impacts to the community and environment. This "Albion River Bridge project" purpose similarly lacks baseline substantial evidence, comparative analysis of substantial evidence, or reference to substantial evidence that (a) the proposed (Alternative 1A/1B) project location in Figure 33, (b) the other three "build alternatives" ("options") that straddle and extend westerly of the existing Bridge or are located to the east of it, or (c) Caltrans' erroneously avoided preservation of the existing Bridge through proper maintenance, repairs, and historic structure-congruent enhancements minimize construction impacts on North and South Albion, the Albion community, the coastal Mendocino County community between Elk and Boonville on the

south and Fort Bragg-Cleone on the north, the Kettleman City and Buttonwillow communities to waste dumps in which existing Bridge timbers would be removed, or the other undisclosed communities in which toxic "project" concrete would be manufactured and through which "project" trucks, other equipment, and out-of-area workers would regularly travel during the four (and potentially six) year "project' construction/ deconstruction period. Notably, the DEIR/S neither presents nor analyzes any information about the number of "project" workers, construction and deconstruction average and peak hour daily truck and private vehicle trips through North Albion, South Albion, the Highway 1 intersections with local roads in Albion, and the adjoining communities in the likely (rather than arbitrarily limited) community impact area of this "project".

32

As further discussed below, preservation of the existing Bridge would minimize construction impacts on the environment and with incorporated mitigations, clearly constitutes the environmentally least damaging project alternative, whereas the proposed (Alternative 1A/1B) project location in Figure 33 would have significant (unmitigated) direct, indirect, and cumulative adverse effects on (in alphabetical order) (1) lower Albion River valley air pollution, (2) the quiet, rural, and highly scenic ambience of coastal Albion, including, but not limited to the lower Albion River Valley and seven staging areas on the first uplifted marine terrace, (3) extended closures of public Albion Cove beach, the North Side Albion River Road and Albion Flat vertical public accessway, Albion River between the Albion Flat marina and

33

6.3. The DEIR/S identifies no valid need for either the unsettled Albion River Bridge project's five "Build Alternatives" or for the Figure 33 "Build Alternative" on the West side of the existing Bridge.

34

• The DEIR-DEIS indicates that inspections in 2021-2022 of the existing Bridge rated it in a "poor and deteriorating condition", which reflect(s) Caltrans' knowingly and intentionally deferred maintenance and seismic upgrade of the Bridge rather than inherent design or construction deficiencies

• By contrast, Dr. Brungraber and Dr. Schmidt based on their observations in 2018 considered that the Bridge overall was in good condition and that placing it on a regular maintenance schedule, and that work performed by qualified workers under expert supervision would preserve it.

35

• The attached Table 1 summarizes the reported bridge inspection report data by decade for bridge inspector's estimated maintenance and repair costs, actual costs, and unperformed/repeated recommended costs between 1944 and 2020. During those 76 years, the bridge inspection reports recommended Albion River Bridge maintenance and repairs totaling $4.8 million (rounded), or $70,000 per year (rounded) on average, whereas reported actual maintenance and repair costs in the reports were $500,000 (rounded), or $6,600 (rounded) per year on average. Repeatedly reported unperformed maintenance and repairs were zero dollars between 1944 and 1950, $1,400 (rounded)

between 1951-1960, $175 between 1961-1970, $40,000 between 1971-1980, $50,500 between 1981-1990, $4.2 million (rounded) between 1991-2000, $16.3 million in 2001-2010, and $33.4 million between 2011-2020.

• Completion of all deferred maintenance, repairs, seismic upgrades of the existing Bridge, and enhancement of it by one or two historical structure-congruent cantilevered pedestrian/bike ways would cost an estimated $35 million, or less than 25% of the estimated $126-$155 million for construction of a new bridge, and thereafter an estimated $1 million per year on average for maintenance and repair. The condition of the existing Bridge thus is not a valid basis for any "need" to replace it.

36

• DEIR-DEIS further indicates that the Bridge has a "low load rating", but omits to disclose that (a) the existing Bridge has no vehicular weight limit and (b) in any event the serpentine Highway 1 Navarro River Grade in south Albion and the serpentine Highway 1 Dark Gulch Grade in north Albion – neither of which Caltrans proposes to bridge, newly ramp, or enlarge - control the size and length of trucks (including "permit loads") that can traverse the Highway over the existing Albion River Bridge (and any new bridge). The load rating of the existing Bridge thus is not a valid basis for any "need" to replace it.

37

• DEIR-DEIS also generally represents that the existing Bridge "is not an appropriate design for the harsh marine environment in which it is located," without substantial evidence and analysis of site specific data or analysis of marine or atmospheric conditions at the semi-sheltered location of the existing Bridge, of the specific location of Bridge timber elements, metal fasteners, and the steel truss in relation to prevailing wind direction, rain storm wind direction, sodium chloride concentrations in the air, the type (e.g., thinly galvanized steel versus stainless steel) and manner in which replacement metal fasteners have been (incompletely and inappropriately) installed, and the juxtaposition of the more than 300 scuppers and repeated multiple potholes that drain the Bridge road deck to timbers and metal fasteners below them.

• DEIR-DEIS itemizes ten "functional, safety, and structural deficiencies" that serve to require removal of the existing Bridge and construction of an as-yet unspecified and substantially incomplete designed (or at least disclosed) "build alternative":

38

First, without description and analysis of "modern seismic standards", of the structural redundancy and flexibility built into the Bridge timber towers, and structural stability of the existing Bridge during a credible seismic design event that may impact the Bridge, the DEIR-DEIS assigns an unquantified "higher probability" of unspecified bridge damage and bridge closure" from an unidentified "seismic event".

39

Second, the existing Bridge steel truss is subject to the Fracture Critical Bridge Inspection and Reports; however, the DEIR-DEIS omits to disclose that none of them have identified any critical fractures in the steel truss and instead posits conjectural failures of it from an undescribed and unanalyzed seismic event or other unanalyzed repetitive wind or "heavy truck" loading. The DEIR-DEIS presents neither substantial evidence nor analysis of the

hypothetical fracturing of the steel truss and thus is not a valid basis for any "need" to replace it, or the entire existing Bridge. Prior bridge inspection reports recommended consideration be given to replacing the steel truss,without replacing the entire Bridge, but the DEIR-DEIS altogether omits analysis of that alternative.

40

Third, although – as already indicated by a Caltrans bridge engineer in a meeting in Albion in 2017 - the Federal Highway Administration has abandoned the prior concepts of "functional obsolescence" and "structural deficiency" as criteria for determining whether a bridge needs to be replaced, the DEIR-DEIS nonetheless presents these superannuated notions in the context of the existing historic Bridge's "narrow deck geometry, including 1-foot wide shoulders", although Caltrans has not marked the existing Bridge with "narrow Bridge" signage and currently operates multiple stretches of Highway 1 upcoast and downcoast from Albion with similar shoulders. The outdated DEIR-DEIS reference thus is not a valid basis for any "need" to replace the existing Bridge.

41

Fourth, the DEIR-DEIS identifies the existing Bridge's lack of "continuous, safe, and separate access for bicyclists and pedestrians, including on the Pacific Coast Bike Route and the California Coastal Trail" as a basis for needed replacement of the existing Bridge, but altogether omits analysis of the recommended historical bridge-consistent cantilevered pedestrian way, which may be constructed to concurrently serve as an off-highway bike way, although electronic signaling of a "bike-on-bridge" (as on US Highway 1 west of Goleta in Santa Barbara County) and/or signage that bicyclists are allowed to utilize an entire line may be yet another feasible alternative to removal of the existing Bridge and construction of a new bridge. Notably, Caltrans has also not improved its Highway 1 right of way in coastal Mendocino County, upcoast and downcoast from the Albion River Bridge, with either the Pacific Coast Bike Route or the California Coastal Trail. Thus, the location of a cantilevered pedestrian (and possible joint bike) way on the existing Bridge is not a valid basis for any "need" to replace the existing Bridge.

42

Fifth, the DEIR-DEIS notes that the iconic timber railings (and posts) of the historic Albion River Bridge are "not capable of resisting current vehicle impact load requirements", without disclosing that they apply to the construction of new bridges. In the now 80-year history of the existing Bridge, only one reported bridge-runoff incident occurred, in 2002 when a fully loaded southbound log truck lost control following a collision with a passenger car, and without any fatality. The DEIR-DEIS omits presentation and analysis of the number of log trucks and other similarly large/heavy trucks that daily on average now operate on Highway 1 in Albion and on the Albion River Bridge in comparison to the peak of the timber industry's reliance on trucks in this area of coastal Mendocino County, but if safety of motorists were truly a Caltrans concern here, the environmentally superior *safety* alternative consists of a reduction, with electronic monitoring and enforcement, in the posted speed limit on the Bridge, with "Historic Bridge" signage that aids in the public understanding of and support for preservation of the historic Albion River Bridge. Thus, its bridge railings and posts do not constitute a valid basis for any "need" to replace the existing Bridge.

Sixth, the DEIR-DEIS asserts, without citation to authority, that the existing Bridge was "designed to carry lighter trucks (e.g., 15-ton trucks)" and omits, as noted above, that the Bridge has no posted weight limit. Further, the DEIR-DEIS speculates, again without substantial evidence or analysis of the as-built redundant structural capacity of the Bridge , that "(h)eavy loads can add strain and advance the structural weakening of the bridge [and] (t)he load rating of the bridge would be reduced over time as a result of continued deterioration." Notably, Caltrans has engaged in no such load rating reduction. Thus, the capacity of the existing Bridge to carry trucks that can access Albion from downcoast or upcoast does not constitute a valid basis for any "need" to replace the existing Bridge.

43

Seventh, the DEIR-DEIS posits the occurrence of "full bridge closure" for "inspection, maintenance, repairs, or safety", without quantified description of its occurrence or temporal length of occurrence for those reasons during the 80-year history of the existing Bridge or analysis of any such full closure of the preserved Bridge in the future. In the aftermath of the 2002 truck-car collision on the Bridge, Caltrans reportedly reopened it to at least reversible one-way traffic within three (3) hours after the incident. No inspections, maintenance, repair, or safety considerations have been reported to involve full closure of the existing Bridge, and the DEIR-DEIS points to none. Brungraber and Schmidt analyzed that replacement of metal fasteners of Bridge timbers, the herring bone pattern of timbers below the road deck, and sequential replacement of checked timbers with temporary bracing can feasibly occur without simultaneous closure of both lanes of the existing Bridge. Thus, one three-hour full closure of the existing Bridge does not constitute a valid basis for any "need" to replace the existing Bridge.

44

Eighth, the DEIR-DEIS speculates, without substantial evidence or analysis, that the existing Bridge is "susceptible to tsunami damage" through "debris loading or possible collapse" of its "many closely spaced bridge supports within the tsunami runup zone", while ignoring that three of the "build alternatives" ("options") presented in the DEIR- DEIS contain foundational elements in that zone's horizontal plane, the sheltering effect for Albion Flat presented by the North and South Albion Headlands (Heads) and nearshore Pacific Ocean bathymetry, and that no tsunami runup in Albion River Valley has been reported in historic time (e.g., after the 1964 Alaska tsunami) or been observed in Albion River bluff stratigraphy. In addition, the DEIR-DEIS contains no geotechnical or structural investigation of the potential impact of a tsunami, whether by wave actions or mobilized large debris, on the existing Bridge towers on Albion Flat or on the south Albion River bank. Notably, the only observed large marine debris in recent years near the north Bridge concrete tower has consisted of ts from the 2002 incident that have been positioned inside the State's Highway 1 right of way near the Bridge's north concrete tower, one other relict log, also in the right of way, inside the at-grade perimeter of the next adjacent upcoast timber tower (none of which Caltrans has deemed necessary to be removed) and a fourth relict log that has episodically been present on the back beach of Albion Cove near where Caltrans in 2017 performed destructive mechanized equipment removal, without the requisite coastal development permit, under color of an "archeological investigation", of the historically significant Albion Lumber Company mill bulkhead site. Thus, the DEIR-DEIS presents no valid site-specific basis for any "need" to replace the existing Bridge on tsunami or mobilized debris grounds.

17

Albion Bridge Stewards Comments, CT Albion River Bridge
Project DEIR/S (6/2024), September 9, 2024

45

Ninth, the DEIR-DEIS repeats - without substantial evidence or analysis of actual performance of existing Bridge maintenance and repair - Caltrans' "anticipation" that the steel truss of the existing Bridge requires painting "approximately every five years" and that the timber fasteners "throughout the entire timber structure" require replacement "approximately every two years". To the contrary, the painting history of the existing Bridge indicates that it was most recently painted 11 years ago, in 2013. Thus, the DEIR-DEIS previously presents no valid Bridge painting, maintenance, or repair schedule as a basis for any "need" to replace the existing Bridge.

46

Tenth, the DEIR-DEIS speculates – again without substantial evidence or analysis – that leaching from (Wolmanized Oregon Douglas Fir) "deteriorating" timbers in the existing Bridge represents an unquantified "risk to the environment". Thus, the DEIR-DEIS presents no current (valid) Bridge "deteriorating" timber leachate data for any "need" to replace the existing Bridge.

47

7. Aesthetics**:** The California Coastal Commission-certified certified County LCP Land use Plan finds that "(t)he Mendocino coast attracts people to sightsee. Scenic resource are the basis of the coast's tourist and retirement economies as well as a source of continuing pleasure for residents." To that end, and in furtherance of the visual quality protection standard of Pub. Res. Code § 30521, LCP Coastal Element Policy 3.5-1 designated and County LCP Land Use Map 18 specifically depicts in an inset map the "highly scenic area" in lower Albion River Valley and adjacent areas of the uplifted first marine terrace that abuts the existing Bridge on the West and East. New development in it must be subordinate to (smaller, below, secondary, less than) the character of its setting. (Pub. Res. Code § 30521, LCP Coastal Element Policies 3.5-1.)

The DEIR/S acknowledges that the "proposed project" "is located within a designated highly scenic area" (apparently in reference to Figure 33, which illustrates the location of "Build Alternative 1", and that is further mapped in plan view in the DEIR/S's secreted "Paleontological Identification/Evaluation Report" Technical Study). However, the DEIR/S fatally omits analysis of the clear fact that the proposed Build Alternative 1 bridge is not subordinate to its setting, as DEIR/S Volume 1 Figures 34-64 clearly demonstrate. Instead, "Build Alternative 1 is (1) a wider, apparently arched near its mid-point, variously higher, and longer concrete bridge with dense inharmonious piers (towers) or a dense arch and piers between it and the road deck, a variously dense superstructure/roadway substructure, and dark steel railings for which the DEIR/S provides no plans in elevation view, or oblique visual simulations for a motorist in a standard passenger car that would be travelling across the proposed new bridge at or above the likely increased speed limit ; (2) reliant on large and prominent bridge foundation elements, large retaining walls, concrete-filled saw-cut abandoned-in-place foundation elements of the existing Bridge, multiple large ramps and trestles, seven visually prominent project staging and construction ingress-egress areas adjacent to and in the viewshed of the existing

Highway 1, Albion Ridge Road , Spring Grove Road, North Side Albion River Road, South Side Albion River Road, Albion-Little River Road, Albion Cove tidelands and public beach, the Mendocino Coast lodge (former Albion River Inn and Restaurant), the LCP-designated North Albion Headlands and north bank Albion River public accessways, Albion campground and marina, the vertical public accessway through the campground to and from public Albion Cove beach (that constitutes the only currently accessible public beach in Albion), the wild and scenic Albion River upstream from the Albion Flat campground and marina, the Albion River Marine Biological Station, and many of the homes, businesses, and the area of the US Post Office (the de facto Albion community center) in the South Albion commercial core; (3) substantial previous unmitigated clearing of trees and understory *baseline* vegetation on the Albion River bluffs and the Albion Cove coastal bluff; (4) new and widened road cuts or fills through both South Albion and North Albion from numerous public view origination points; (5) unsupported by a speculative, undisclosed external finishing scheme that does not constitute valid mitigation; and (6) erroneously, without thorough site specific analysis, identifies a mere six (6) "key view [origination] location and direction" points that omit the significant public views from over 100 origination points that encompass the lower Albion Valley and adjacent uplifted marine terrace viewshed into which the "Build Alternative 1" new out-of-local-character concrete bridge would be substantially and imposed, including, but not limited to, along the North Albion Head public accessway, the Mendocino Coast Lodge and Restaurant, southbound Highway 1, the intersections of Highway 1 with Albion-Little River Road and with North Side Albion Road, North Side Albion Road, traditional walking paths between North Albion Village along south-facing Albion Bluff and Albion Cove public beach, the Albion Flat campground and marina, Schooner's Landing recreational facility, the wild and scenic (recreational) intertidal Albion River upstream, beneath, and downstream from the "Build Alternative 1" alignment, inner Albion Cove, Albion Cove beach, the Albion River Marine Biological Station, the traditional vertical public accessway along the south bank of Albion River to South Albion Head, Albion Ridge Road, northbound Highway 1 south of the bridge, South Side Albion River Road, Albion Street, East Lane, and Garden Road, as well as in the Lower Albion Valley, Albion River Bluff, and Albion Cove, beach, and dune viewsheds from residences and visitor-rentals in South Albion and North Albion.

The proposed Build Alternative 1 project therefore has substantial unmitigated adverse effects on protected scenic visual quality (aesthetics) and is inconsistent with the controlling Coastal Act and certified LCP new development subordination visual protection standards.

Similarly, neither the "Build Alternative 2" (options A and B) nor the "Build Alternative 3A" is subordinate to the character of the lower Albion River valley setting, and therefore each is substantially inconsistent with the harmonized controlling development regulatory

requirements of the Coastal Act, certified County LCP, and the federally approved CCMP that incorporates both.

That fundamental inconsistency with the controlling visual quality standard for Caltrans' "Albion River Bridge project" renders it legally unavailable and infeasible from the start. The only legally consistent and therefore feasible Albion River Bridge project consists of the preservation of the existing Bridge within its existing development envelope and perimeter.

48

8. Air Quality: The DEIR/S contains (a) no "Albion River Bridge project" site specific wind direction, velocity, and duration data for the lower Albion River Valley and adjacent uplifted first marine terrace project staging, haul roads, and construction subareas, (b) no sufficiently detailed construction and post-construction revegetation plan for graded and otherwise disturbed areas, and (c) no identified legally available source for construction process (e.g., dust control) water in chronically water short coastal Mendocino County, which renders the generic air quality analysis and suggested (but not strictly enforceable) project monitoring and mitigation measures to protect existing residential, commercial, and recreational uses of the lower Albion River Valley and adjacent uplifted marine terrace speculative, likely unavailable, and invalid.

49

9. Biological Resources: The DEIR/S omits accurate description and analysis of baseline biological conditions. Caltrans' proposed two "Build Alternative 1" (West Alignment) and the four other "Build Alternatives" will have significant direct, indirect, and cumulative adverse effects (impacts) on protected sensitive floral and faunal species and their habitats. Notwithstanding that Caltrans has a repeated history of failing to implement both its own proposed development project mitigation in Albion, and that required by regulatory agencies, the DEIR/S - without any rational analysis and without a defined Project mitigation monitoring and reporting program - proposes speculative future mitigation measures that do not assure clear, quantified, and enforceable in-kind mitigation performance measures. Individually and collectively the DEIR/S description and analysis of the proposed Project (or the four other "Build Alternatives") do not document or demonstrate that it (or they) would avoid, substantially reduce, or substantially offset significant direct, indirect, and cumulative adverse on sensitive biological resources.

50

9.1. Floral Resources. The following parts contain contemporary (2023, 2024) field observation notes, with species lists, by Albion botanical scientist and Albion Bridge Steward Alison Gardner on three Caltrans "Albion River project" staging areas (9.1.1.) between South Side Albion River Road and Highway 1 in the area of Albion-Little River Dire District Station 810, (9.1.2.) between Spring Grove Road and Highway 1 on the apex parcel north of Ledford House Restaurant, and (9.1.3.) on the parcel east of Highway 1 and both north and south of PM 44.2. **Exhibit 6** maps the location of the "Albion River

bridge project"6, haul roads, the proposed "Build Alternative 1A-1B West Alignment" project, some of the proposed temporary project trestles, and of observed Pygmy Cypress within and near the project area.

The species lists identify sensitive flora not reported in the DEIR/S, which more generally also raises doubt about the accuracy and completeness of species lists for other "Albion River Bridge project" subareas that apparently were prepared by persons without substantial knowledge of the locally extant species or subspecies. Including scientists with extensive local knowledge of (e.g., floral species) in the preparation of the supplemental environmental document on the whole *environmentally superior* project would avoid the DEIR/S' significant data gaps and errors in site characterization and analysis. The occurrence on the proposed staging areas of wetland and floral sensitive resources, combined with the presence of other wet and upland environmentally sensitive habitat within 100 feet of them renders these three staging areas inconsistent with Pub. Res. Code sections 30240(a) and 30240(b), and thus unavailable on biological grounds for use by Caltrans as staging areas for the "Albion River Bridge project".

9.1.1. Area Behind the Fire House. The annotated aerial photograph, below, depicts the location of parts of the "Behind the Fire House" staging area between Highway 1 and South Side Albion River Road, west and north of Albion-Little River Fire District Station 810, and the Albion Grocery Store. DEIR/S Figure 16 delineates this staging area (the fourth staging area, counting the "PM 44.2" staging area as the first and heading south, to extend both north and south of the observed area in which the Albion River Bridge project would employee mechanized and hand-held equipment to remove vegetation, including through removal of its roots "as necessary" (a term for which the DEIR/S in this context provides no verifiable criteria), to clear the area for unimpeded equipment access and staging, including by the construction and use of heavy equipment ingress and egress ramps between the staging area and South Side Albion River Road and Highway 1.

This area had in substantial part recently been mowed before the field observations, but the apparent primary occurrence of sweet vernal grass, with velvet grass and probably Australian oatgrass, suggests community classification of it as Sweet Vernal Grass/Velvet grass semi-natural stands. A small draw that had not been mowed contained wetland vegetation that consisted mostly of bog rush (*Juncus hesperius*), velvet grass (*Holcus lanatus*), and lady fern (*Atherium felix-femina*). This would classify as Soft and Western Rush marshes, and this wetland area should be protected, including through a 100-foot wide buffer zone around it.

The area over the fence to the west (i.e., in the State Highway 1 right of way) contained mostly coyote bush (*Baccharis pilularis var. consanguineum*) and sweet vernal grass

(*Anthoxanthum odoratum*). If the area to the east of the fence were not mowed, it would likely naturally also be vegetated with coyote brush scrub.

Himalayan blackberry was abundantly resprouting in the recently mowed field to the north of the Albion Grocery Store, which would classify it as Himalayan blackberry scrub.

The location and extent of the observed plant communities thus differ substantially from those mapped on DEIR/S Figure 77 that identify them as "ruderal vegetation", and also differ from the shown discontinuous and generally narrower patches of "vernal grass meadows" in the Highway 1 right of way. Wetlands and sensitive upland plant communities constitute Coastal Act and County LCP environmentally sensitive habitat areas (ESHA), which are required to be protected against any significant disruption of habitat values, and in which only uses dependent on those resources shall be allowed. Staging for Bridge construction/deconstruction does not constitute a use of these habitat areas that is dependent on them, and the development in and of them that the DEIR/S identifies will destroy or substantially degrade, rather than protect, them. The subject staging area therefore does not constitute a permissible use of protected coastal resources and the unavailability of the proposed development staging area constitutes yet another factor for why the proposed Albion River Bridge project (or any of the other "build alternatives") is not the environmentally preferred (superior, least damaging) alternative. Moreover, even if subareas within this staging area were determined on further expert inspection to not constitute ESHA, the geometry of this staging area precludes provision of 100 foot (or minimum 50 feet) wide buffers around the identified ESHA, and therefore fails the cognate Coastal Act and LCP requirement that development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with their continuance.

Below is the preliminary list of observed plants within the subject part of this staging area; the identification of the first three listed plants is tentative.

Binomial	Common Name	Native?
Carex rossii	Ross' sedge	yes
Rosa wichuriana 'Red Dorothy Perkins'	Rose	no
Rumex crassus	willow-leaved dock	yes
Allium cepa	domestic onion	no
Anaphalis margaritacea	pearly everlasting	yes
Anthoxanthum odoratum	sweet vernal grass	no

Athyrium felix-femina var. cyclosorum	lady fern	yes
Baccharis pilularis ssp consanguinea	coyote bush	yes
Dactylis glomerata	orchard grass	no
Danthonia californica	California oatgrass	yes
Equisetum telmateia ssp braunii	giant horsetail	yes
Festuca perennis	perennial ryegrass	no
Fragaria chiloensis	beach strawberry	yes
Heracleum maximum	cow parsnip	yes
Holcus lanatus	velvet grass	no
Horkelia californica var. californica	California horkelia	yes
Juncus hesperius	coast rush	yes
Lonicera involucrata var. ledebourii	twinberry	yes
Malus pumila	apple	no
Pinus radiata	Monterey pine	no
Rubus armeniacus	Himalayan blackberry	no
Rubus ursinus	California blackberry	yes
Rumex crispus	curly dock	no
Symphyotrichum chilense	California aster	Yes

Behind the Firehouse

9.1.2. The triangular area north of the Ledford House Restaurant. The annotated aerial photograph, below, depicts the location of ESHA and 100-foot buffer zones on the triangular parcel north of the iconic Albion community Ledford House Restaurant and between Spring Grove Road on the west and Highway 1 on the east. The "Albion River Bridge project" proposes to use this parcel as the 7th and southerly-most equipment and materials staging area, with the same development and disturbances as proposed for the "Behind the Firehouse" staging area discussed above, except that the heavy equipment access ramps would be between this staging area and widened Spring Grove Road on the West and, potentially, Highway 1 on the east. The DEIR/S, erroneously and prejudicially to review of the whole project, does not either describe or depict the ramps and other structural development of the seven proposed staging areas in plan, section, or elevation view (e.g., as seen from scenic Highway 1, Albion-Little River Road, North Side Albion River Road, South Side Albion River Road, Albion Ridge Road, and Spring Grove Road).

The plant list and analysis in this part reflect conditions in the subject area on which native and/or naturalized plants were observed during Fall, 2023, when many spring and early

summer blooming plants have become dessicated. Although the DEIR/S does not indicate that the Albion River bridge project will utilize the parcel on which the Ledford House Restaurant, pond, riparian vegetation, and rare plants are located, the staging area is within 100 feet (or in cases, within 50 feet) of them, but is proposed to not have a buffer zone of either dimension to protect them against significant disturbance from staging area development and use by heavy mechanized equipment and bridge construction/Bridge destruction materials over the projected four to six year project period.

Natural plant communities are ranked S (state) 1 through 5, and G (global) 1 through 5. Rankings 1 through 3 are considered sensitive and should receive buffer zones. The lower the number, the more sensitive. Rankings 4 and 5 are not sensitive and have no protection. NR means not rated. The State rankings are the ones that apply. Rare plants are ranked 1 through 4. 1 and 2 are considered rare, 3 signifies not enough data, and 4 identifies plants of limited distribution which may become rare.

The parcel on which the Ledford House Restaurant is located has a large area of wetlands, for which the County LCP in implementation of the Coastal Act generally requires a 100' buffer. The wetland includes the pond; they pre-existed the construction of Highway 1. The presence of domestic water lilies on the pond does not affect its wetland and thus wet ESHA status.

The pond contains native pondweed (***Potomogeton sp***.), in the plant community ***Stuckenia*** (***pectinata***) - ***Potamogeton*** spp. Herbaceous Alliance, or Pondweed mats, https://vegetation.cnps.org/alliance/475, and is ranked S3, G3G5. The alliance description also includes ***Eleocharis macrostachys***, or spikerush, which grows along the SW bank of the pond, and ***Juncus articulatus***, the jointed rush.

Along the southeastern bank of the wetland are native tules (***Schoenoplecus sp***., either ***S. acutus var. occidentale*** or ***S. californicus***), which classify as ***Schoenoplectus*** (***acutus***, ***californicus***) Herbaceous Alliance, or Hardstem and California bulrush marshes, https://vegetation.cnps.org/alliance/561, ranked S3S4, GNR. A flock of red winged blackbirds was observed during the site visit to settle down for the night in the tules. They may possibly also nest there. The DEIR/S erroneously omits description and analysis of these ESHA conditions, and the requirement for a protective 100-foot (minimum 50-foot) wide buffer on the adjoining parcel to the north that the "Albion River Bridge project" proposes to develop and use as a staging area. Perimeter "ESHA fencing", even when erected and properly maintained, does not function to protect the sensitive biota in the absence of the required dimensional setback for proximate development that geospatially protects the ESHA.

There are also two pygmy cypress on the parcel, just south of a truckbox at the north end of the developed area, which have rare plants ranking 1B2, and would also require 100'

25

Albion Bridge Stewards Comments, CT Albion River Bridge
Project DEIR/S (6/2024), September 9, 2024

buffers. One is mature, and one is a sapling. Pygmy cypress growing on the headlands can be told apart from Monterey cypresses by two things: their cones are smaller, generally less than an inch, and they are a bit weepy in habit. Pygmy cypress cones vary from ½ to 1" in diameter; Monterey cypress cones from ¾ to 1 ½" in diam., so there is a little overlap. https://www.calflora.org/app/taxon?crn=11192. There are also a number of pygmy cypresses on the parcel just north of Spring Grove Road, which may be located in the area where Caltrans proposes to widen it for construction access to the subject staging area – and, cumulatively, for construction access to the also highly controversial nearby Caltrans Salmon Creek Valley "lead remediation" and Salmon Creek Bridge "replacement" development projects that would take substantial access by Spring Grove Road. The DEIR/S erroneously and prejudicially to its public review fails to describe and analyze Caltrans' proposed cumulative use of the subject staging area over an additional three to five years to the "Albion River Bridge project" four to six year period.

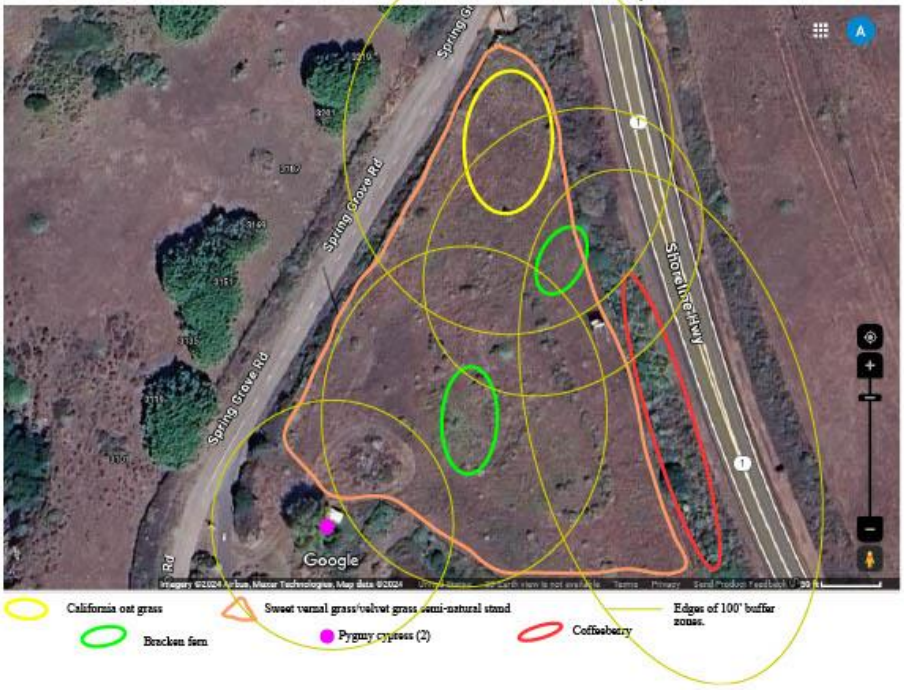
Numerous pygmy cypresses also grow on the west side of Highway 1, south of the south end of the Albion River Bridge, which Caltrans proposes to remove for (1) the proposed Albion River Bridge project construction haul road between the proposed staging area northwesterly of the Highway 1-Albion Ridge Road intersection and the proposed construction trestle and recurved easterly haul road in ESHA on the steep north-facing slope of Albion River Bluff, and (2) cumulatively, as the site for the proposed westerly new alignment of the Highway 1 south approach to proposed "Build Alternative 1". The haul road and Highway 1 alignment are not dependent on a location in this ESHA because the environmentally superior (least environmentally damaging) project alternative consists of preservation of the existing Bridge, which requires neither the haul road nor the new westerly highway approach alignment.

Both downward-seaward sloping parcels support substantial numbers of coffeeberry plants (*Frangula californica*), some intermixed with coyote brush (*Baccharis piluaris*). This habitat classifies as *Frangula californica - Rhododendron occidentale - Salix breweri* Shrubland Alliance, also known as California coffeeberry - western azalea - Brewer's willow scrub and is ranked S3, G3. https://vegetation.cnps.org/alliance/547.

The northerly part of staging area parcel north of the Ledford House Restaurant, which Caltrans also proposes to use for storage of excavated earthen materials from the Salmon Creek projects site that are contaminated with lead up to 6,000 mg/kg, also supports a relatively high density (on the apparent order of 30%) of California oat grass for which the best-fit alliance is *Festuca idahoensis - Danthonia californica* Herbaceous Alliance, or Idaho fescue - California oatgrass grassland; S3, GNR. https://vegetation.cnps.org/alliance/580. The subject subarea also contains sweet vernal grass.

The parcel also supports several areas with a fairly dense cover of bracken ferns, which therefore may fall under the category of ***Bromus carinatus - Elymus glaucus*** Herbaceous Alliance, or California brome - blue wildrye prairie, S3,G3; https://vegetation.cnps.org/alliance/499. Although the name of the alliance does not mention bracken fern, but by the rules for the alliance and notice of it alternately equates it to ***Pterideum aquilinum*** (bracken fern), which by observation (when not dormant) covers at least 60%, and quite possibly more, of the subject area. The map below depicts the observed floral distributions on the parcel north of the Ledford House that Caltrans proposes as the 7th staging area of the Albion River Bridge project (and the proposed 6th – northerly-most – staging area for the "lead abatement" project in proximate lower Salmon Creek Valley).

Field north of Ledford House, CalTrans dump site



27

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

Membership Rules (for Calif. brome-blue wildrye prairie)

- *Bromus carinatus, Bromus maritimus*, or *Pteridium aquilinum* characteristically present with native plants > 25% relative cover in the herbaceous layer (Rodriguez et al. 2017).
- *Elymus glaucus* > 30% relative cover in the herbaceous layer (Buck-Diaz et al. 2012).
- *Bromus carinatus, Thermopsis californica*, and/or *Pteridium aquilinum* > 30% relative cover in the herbaceous layer (Evens and Kentner 2006).
- *Bromus carinatus, Elymus glaucus*, or *Pteridium aquilinum* > 30% relative cover in the herbaceous layer (Klein et al. 2015).
- *Bromus carinatus* characteristically present with native plants > 10% relative cover in the herbaceous layer (Buck-Diaz et al. 2013).
- *Bromus carinatus, Bromus maritimus, Elymus glaucus, Pteridium aquilinum* and/or *Thermopsis californica* > 30% relative cover in the herbaceous layer (Buck-Diaz et al. 2021, Sikes et al. 2021, Sikes et al. 2023).

With the 100' buffer for the wetland, the California oatgrass, and the bracken fern, no place remains on this staging area for the storage of excavated or fill material.

Preliminary plant list for the Spring Grove Road-Highway 1 Apex Parcel and Adjoining Areas of the Ledford House Restaurant Parcel

Binomial	Common Name	Native?	Present?	Rare?	WMVC
Achillea millefolium	yarrow	yes	x		FACU
Agrostis capillaris	colonial bentgrass	no	x		FAC
Agrostis sp. (not blasdalei)	bent grass		x		
Anaphalis margaritacea	pearly everlasting	yes	x		FACU
Anthoxanthum odoratum	sweet vernal grass	no	x		FACU
Arctotheca prostrata	prostrate capeweed	no	x		
Athyrium felix-femina var. cyclosorum	lady fern	yes	x		FAC
Avena barbata	Slender Wild Oats	no	x		
Baccharis pilularis ssp consanguinea	coyote bush	yes	x		
Briza maxima	rattlesnake grass	no	x		
Bromus hordeaceus	soft chess	no	x		FACU
Bromus sitchensis var. carinatus	California brome	yes	x		
Bromus sitchensis var. maritimus	maritime brome	yes	x		
Calamagrostis nutkaensis	Nootka reed grass	yes	x		FACW
Carduus pycnocephalus ssp. Pycnocephalus	Italian thistle	no	x		

Carex gynodynama	Wonder Woman sedge	yes	x	FAC
Carex obnupta	slough sedge	yes	x	OBL
Carex spp.	sedge	yes	x	
Chrysothrix candelaris	gold dust lichen	yes	x	
Cirsium arvense	Canada thistle	no	x	FAC
Cirsium vulgare	bull thistle	no	x	FACU
Conium maculatum	poison hemlock	no	x	FAC
Cotoneaster lacteus	late cotoneaster	no	x	
Cotoneaster sp.	cotoneaster	no	x	
Crocosmia X crocosmiiflora	Montbretia Lily	no	x	FAC
Cyperus eragrostis	nutsedge	yes	x	FACW
Danthonia californica	California oatgrass	yes	x	FAC
Daucus carota	wild carrot	no	x	FACU
Deschampsia cespitosa ssp cespitosa	Hairgrass	yes	x	FACW
Eleocharis macrostachya	spikerush	yes	x	
Elymus sp.	Wildrye	yes	x	
Epilobium ciliatum spp. watsonii	American fireweed	yes	x	FACW
Equisetum sp.	Horsetail		x	FACW
Erigeron canadensis	horseweed	yes	x	FACU
Erodium cicutarium	filaree	no	x	
Festuca arundinacea	tall fescue	no	x	
Festuca bromoides	brome fescue	no	x	
Festuca perennis	perennial ryegrass	no	x	FAC
Festuca rubra	red fescue	yes	x	FAC
Fragaria chiloensis	beach strawberry	yes	x	FACU
Fragaria vesca	wood strawberry	yes	x	FACU
Frangula californica	coffeeberry	yes	x	
Frangula purshiana ssp purshiana	cascara sagrada	yes	x	FAC
Galium aparine	bedstraw	yes	x	FACU
Galium sp.	bedstraw		x	
Galium trifidum ssp. columbianum	bedstraw	yes	x	FACW
Galium triflorum	sweet-scented bedstraw	yes	x	FACU
Genista monspessulana	French broom	no	x	
Hedera helix	English ivy	no	x	
Heracleum maximum	cow parsnip	yes	x	FAC
Hesperocyperus macrocarpa	Monterey cypress	no	x	

29

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

Hesperocyperus pygmaea	pygmy cypress	yes	x	*y*	
Holcus lanatus	velvet grass	no	x		FAC
Hordeum sp.	Foxtail		x		
Hypochoeris radicata	coast dandelion	no	x		FACU
Hypogymnia sp.	lichen	yes	x		
Ilex aquifolium	English holly	no	x		FACU
Iris douglasiana	Douglas iris	yes	x		
Juncus articulatus	jointed rush	yes	x		OBL
Juncus hesperius	coast rush	yes	x		
Juncus patens	blue rush	yes	x		FACW
Leontodon saxatilis	hawkbit	no	x		UPL
Leucanthemum vulgare	ox-eye daisy	no	x		
Linum bienne	blue flax	no	x		
Lonicera hispidula	twining honeysuckle	yes	x		FACU
Lotus angustissimus	lotus	no	x		
Lotus corniculatus	bird's foot trefoil	no	x		FAC
Lupinus arboreus	bush lupine	yes	x		
Lysimachia arvensis	scarlet pimpernel	no	x		FAC
Lythrum hyssopifolia	loosestrife	no	x		OBL
Madia sativa	Coast Tarweed	yes	x		
Malus pumila	apple	no	x		
Malva parviflora	mallow	no	x		
Matricaria discoidea	pineapple weed	yes	x		FACU
Medicago polymorpha	Bur Clover	no	x		FACU
Mentha pulegium	pennyroyal	no	x		OBL
Morella californica	wax myrtle	yes	x		FACW
Navarretia squarrosa	skunk weed	yes	x		FACU
Nymphaea odorata	white waterlily	no	x		OBL
Oenanthe sarmentosa	water parsley	yes	x		OBL
Panicum acuminatum var. fasciculatum	panic grass	yes	x		
Plantago coronopus	cut-leafed plantain	no	x		FAC
Plantago lanceolata	English plantain	no	x		FACU
Plantago major	common plantain	no	x		FAC
Plantago subnuda	plantain	yes	x		FACW
Polystichum munitum	western sword fern	yes	x		FACU
Potamogeton sp	pondweed	yes	x		OBL
Potentilla anserina ssp. pacifica	cinquefoil	yes	x		OBL

30

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

Prunella vulgaris ssp. lanceolata	self-heal	yes	x	FACU
Pseudognaphalium luteoalbum	cudweed	yes	x	FACW
Pseudotsuga menziesii var. menziesii	Douglas fir	yes	x	FACU
Pterideum aquilinum var. pubescens	bracken fern	yes	x	FACU
Ranunculus repens	creeping buttercup	no	x	FAC
Raphanus sativus	wild radish	no	x	
Rosa nutkana var. nutkana	Nootka rose	yes	x	FAC
Rubus armeniacus	Himalayan blackberry	no	x	FAC
Rubus ursinus	California blackberry	yes	x	FACU
Rumex acetosella	sheep sorrel	no	x	FACU
Rumex conglomeratus	green dock	no	x	
Rumex crispus	curly dock	no	x	FAC
Rumex sp.	dock		x	
Rytidosperma penicillatum	Australian oatgrass	no	x	
Salix lasiandra var. lasiandra	pacific willow	yes	x	FACW
Salix lasiolepis	arroyo willow	yes	x	FACW
Schoenoplectus acutus var. occidentalis	tule	yes	x	OBL
Senecio glomeratus	Australian fireweed	yes	x	
Senecio jacobaea	tansy ragweed	no	x	
Senecio minimus	Australian fireweed	no	x	FACU
Silybum marianum	milk thistle	no	x	
Sisyrinchium bellum	blue-eyed grass	yes	x	FACW
Sisyrinchium californicum	golden-eyed grass	yes	x	FACW
Sonchus asper	prickly sow thistle	no	x	FACU
Sonchus oleraceus	sow thistle	no	x	UPL
Spergularia rubra	sand-spurrey	no	x	FAC
Spiranthes romanzoffiana	Ladies Tresses	yes	x	FACW
Stachys chamissonis	horse mint	yes	x	FACW
Stachys rigida var. quercetorium	horse mint	yes	x	FACW
Symphyotrichum chilense	California aster	yes	x	FAC
Trifolium repens	white clover	no	x	FAC
Tropaeolum majus	nasturtium	no	x	UPL
Urtica dioica ssp gracilis	stinging nettle	yes	x	FAC
Usnea spp.	old man's beard	yes	x	
Vaccinium ovatum	black huckleberry	yes	x	FACU
Vinca major	periwinkle	no	x	
Watsonia meriana	Bulbil Watsonia	no	x	

31

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

9.1.3. Gabriela Levine's Parcel northwesterly from the Mendocino Coast Lodge (former Albion River Inn) and easterly of Highway 1. DEIR/S Figure 16 also proposes to acquire a temporary construction easement from the unwilling owner to develop and use the obliquely L-shaped parcel in the designated highly scenic and environmentally sensitive Highway 1 viewshed North through East of PM 44.3 as an "Albion River Bridge project' staging area.

The flora on this parcel consists primarily of *Holcus lanatus* - *Anthoxanthum odoratum* Herbaceous Semi-Natural Alliance Common velvet grass - sweet vernal grass meadows, SNA, GNA; https://vegetation.cnps.org/alliance/400, with scattered coyote brush (*Baccharis piluaris* var. *consanguineum*). The owner, who has knowledge of the Albion area flora, has also reported Harlequin lotus (*Hosackia gracililis*), a CNPS list 4 threatened plant, and the presumed food plant for the caterpillars of the federally-listed endangered Lotis blue butterfly (*Lycaeides argyrognomon lotis*), to occur on the parcel. The presence of the Alliance and Harlequin lotus on the parcel render those areas of it where they occur ESHA. Proposed staging for the "Albion River Bridge project" on this parcel does not constitute development and use that is dependent on a location in ESHA, and is therefore inconsistent with the controlling prohibition of such development in the Coastal Act and County LCP. Application of the Coastal Act and LCP (100-foot, minimum 50 foot) ERSHA buffer requirements may likely preclude development and use of the parcel as a staging area for the "Albion River Bridge project". DEIR/S Figure 73 maps three polygons on which Harlequin lotus occur, but omits the distribution of the Common velvet grass - sweet vernal grass meadows SNA.

Gabriella's Parcel North of Albion River Inn, East of Hwy. 1

Preliminary Plant List:

Binomial	Common Name	Native?	Present?	Rare?	WMVC
Carex harfordii	Harford's sedge	yes	?		OBL
Carex subbracteata	small-bracted sedge	yes	?		FACW
Elymus glaucus ssp glaucus	blue wildrye	yes	?		FACU
Vicia lutea	yellow vetch	no	?		UPL
Vicia sativa ssp. nigra	Narrow-leaved vetch	no	?		UPL
Vicia sativa ssp. sativa	spring vetch	no	?		UPL
Achillea millefolium	yarrow	yes	x		FACU
Agrostis capillaris	colonial bentgrass	no	x		FAC
Amelanchier alnifolia var. semiintegrifolia	service berry	yes	x		FACU
Anthoxanthum odoratum	sweet vernal grass	no	x		FACU
Baccharis pilularis ssp consanguinea	coyote bush	yes	x		
Briza maxima	rattlesnake grass	no	x		
Calystegia purpurata ssp. purpurata	coast morning glory	yes	x		

33

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

Carduus pycnocephalus ssp. pycnocephalus	Italian thistle	no	x	
Cirsium vulgare	bull thistle	no	x	FACU
Cotoneaster horizontalis	herringbone cotoneaster	no	x	
Cotoneaster lacteus	late cotoneaster	no	x	
Cotoneaster pannosus	silverleaf cotoneaster	no	x	
Danthonia californica	California oatgrass	yes	x	FAC
Elymus sp.	Wildrye	yes	x	
Eschscholtzia californica	California poppy	yes	x	
Fragaria chiloensis	beach strawberry	yes	x	FACU
Frangula californica	coffeeberry	yes	x	
Holcus lanatus	velvet grass	no	x	FAC
Hosackia gracilis	Harlequin lotus	yes	x	*4* FACW
Hypochoeris radicata	coast dandelion	no	x	FACU
Leontodon saxatilis	hawkbit	no	x	UPL
Linum bienne	blue flax	no	x	
Lotus corniculatus	bird's foot trefoil	no	x	FAC
Lythrum hyssopifolia	loosestrife	no	x	OBL
Madia sativa	Coast Tarweed	yes	x	
Morella californica	wax myrtle	yes	x	FACW
Niebla cephalota	lichen	yes	x	
Pinus muricata	Bishop pine	yes	x	
Plantago lanceolata	English plantain	no	x	FACU
Pseudotsuga menziesii var. menziesii	Douglas fir	yes	x	FACU
Pterideum aquilinum var. pubescens	bracken fern	yes	x	FACU
Pyrus communis	pear	no	x	
Ramelina farinacea	lichen	yes	x	
Ramelina menziesii	old man's beard	yes	x	
Raphanus sativus	wild radish	no	x	
Rosa nutkana var. nutkana	Nootka rose	yes	x	FAC
Rubus armeniacus	Himalayan blackberry	no	x	FAC
Rubus ursinus	California blackberry	yes	x	FACU
Rumex acetosella	sheep sorrel	no	x	FACU
Rytidosperma penicillatum	Australian oatgrass	no	x	
Senecio glomeratus	Australian fireweed	yes	x	
Sonchus oleraceus	sow thistle	no	x	UPL
Toxicodendron diversilobum	poison oak	yes	x	FAC
Viola adunca	western dog violet	yes	x	FAC

34

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

9.1.4. Albion North Side Road. The "Albion River Bridge project" proposes to substantially widen and in parts relocate the North Side Albion River Road to serve as the haul road to/from ramps and trestles at the northerly end of the project and as the sole motorized vehicle access to the second – and primary - proposed project staging area on most of Albion Flat.

Observation while on foot of visible flora on the south facing Albion River bluff proximate to the County's public North Side Albion Road identified numerous understory native plants, some of which are rare and others of which are uncommon, below non-native blue-gum Eucalyptus in the project area, including several blooming Castillejas on the down slope from the Road that due to their distance from it could not be identified as to their species. There are two rare *Castillejas* reported in the general area; *C. mendocinoensis*, and *C. affinis ssp. litoralis*. Rare plant habitat in the coastal zone, as here, constitutes protected ESHA. The DEIR/S does not disclose their presence, which may likely be within the area of, or within 100 feet of the perimeter of, proposed North Side Albion River Road haul road development, project construction/destruction ramps or trestles, and within the alignments of "Build Alternatives 2A-2B and 3A, each of which would likely have a significant adverse effect on this ESHA. None of these developments is dependent on a location in, or within 100 feet of, *Castillejas* ESHA and therefore prohibited pursuant to the Coastal Act and County LCP.

The DEIR/S contains no site-specific, to-scale, topographical plans, sections, and elevations that legibly depict the location of proposed North Side Albion River Road haul road development, project construction/destruction ramps or trestles, and "Build Alternatives 2A-2B and 3A" in relation to either the *Castillejas* ESHA or the ≥4 young Pygmy cypress (*Hesperocyparis pygmaea*) that occur in the area to the east of the hairpin bend in the Road that the DEIR/S indicates Caltrans proposes to widen and/or relocate. Pygmy cypress are a very rare plant that grows only in the coastal regions of Mendocino and northern Sonoma counties. It grows in the "pygmy forest ESHA (as established in *Sierra Club v. Calif. Coastal Commission*, 12 Cal. App. 4th 603 [1993])," in bogs, and on the headlands. In addition to the Pygmy cypress growing to the east of the hairpin turn on the North Side Albion River Road, there are 10 or so just south of the historic Albion River Bridge (most to the west of the highway, but a couple of young ones on the east bank of the Highway), two on the Ledford House Rerstaurant property, and several north of Spring Grove Road, west of the Highway. The DEIR/S failed to even consider that they could be there, erroneously confusing and listing only Monterey cypress in the Albion River Bridge project area.

Some plants here that are unusual (rather than rare) on the south-facing Albion River bluff in the project area include one California buckeye (*Aesculus californica*) and a number of

Oso berries (*Oemlera cefolia*). Native western thistle (*Cirsius brevistylum*), which is an important nectar plant for the rare and endangered Behren's Silverspot Butterfly, and the Pearly everlasting (*Anaphalis margaritacea*),also occur in this area. The annotated aerial map, below, illustrates their observed ESHA locations, which (a) requires substantial additional botanical field work to be completed to fully map the locations of these sensitive habitats in relation to fully disclosed project components on the south-facing bluff, and (b) prohibits the proposed project development and uses in ESHA on it, given that neither is dependent on a location in ESHA, or (c) in the alternative requires 100-foot ESHA buffers to protect them against significant disturbance or destruction. **Exhibit 5** contains a preliminary list of observed plants in the project area adjacent to North Side Albion River Road that could be observed from it; observations of plants east of the hairpin turn in the Road were made pursuant to permission by the owner of that private property.

Albion North Side Road

51

9.2. Faunal resources. First, the "Build Alternative 1" Albion River Bridge project has previously (in 2017-2019, and at other times) removed numerous trees, which certified County LCP Land Use Map 18 mapped as Osprey (*Pandion haliaetus*)nesting habitat ESHA, from the low hill on the northwest side of the existing Bridge and outside the

existing Highway 1 road prism. As migratory birds, Ospreys constitute a protected species pursuant to international treaty to which the United States is a party (16 U.S.C. §§ 703 *et seq.*, the Migratory Bird Treaty Act), which has the force of controlling law in this and other States. Osprey have been observed in recent years over Albion Cove and in trees on north-facing Albion River bluff, but Caltrans' knowing and intentional removal of the trees from the low hill northwesterly of the Bridge and creation of a wind funnel and human activity corridor through them has precluded renewed Osprey nesting. Illustrative maps of the proposed new bridge and upcoast Highway 1 alignment in the DEIR/S locate the north approach of proposed Build Alternative 1 in and through that corridor, and thus the direct cumulative result of Caltrans' prior tree removal and Osprey ESHA displacement. The DEIR/S fails to describe and analyze this baseline condition, and on that basis is incomplete, inaccurate, and inconsistent with the requirements pursuant to CEQA and NEPA for such baseline environmental analysis, impact avoidance, and full mitigation.

52

Second, Build Alternative 1A proposes to partly dam, divert, and - with substantial (but in the DEIR/S unquantified aggregate noise/pressure generated by multiple and cumulative generating sources, including, but not limited to extensive pile driving, mechanical excavation grading of proximate Albion River bluffs, use of jackhammers, and mechanized vehicles) and currently unmitigated discharges of earthen and other particulate matter from project grading, construction, and existing Bridge demolition/removal operations to the anadromous fishery Albion River - obstruct and impair the migration of listed sensitive Coho salmon and Steelhead through the Albion River Estuary.

The DEIR/S neither presents nor analyzes any currently feasible mitigation measures to avoid, substantially reduce, or otherwise validly mitigate these likely persistent and significant adverse effects on the protected species, inconsistent with the requirements in CEQA, NEPA, the California Coastal Act (Pub. Res. Code §§ 30230 ["Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes"], and the federally-approved CCMP.

53

Further, the coffer dam on which Build Alternative 1A/1B proposes to centrally rely for construction of the new bridge is inconsistent with the requirements of Pub. Res. Code § 30236, which restrict construction of dams, without limit, to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or

to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat. Proposed Build Alternative 1A/1B constitutes none of the allowable dam uses, and on that basis is legally unavailable and infeasible.

54

Third, the Albion River Bridge project proposes to withdraw up to 16,000 gallons/day from the groundwater beneath Albion Flat for use as bridge grading and construction process water. Notwithstanding that Caltrans has performed (but not disclosed to the public, including in response to a documents request therefor) subsurface geotechnical and geological investigations in Albion Flat, and therein identified the gravel layer(s) beneath the sand surface of Albion Flat, the DEIR/S altogether omits description and analysis – inconsistent with the environmental information requirements of CEQA and NEPA, and the substantive requirements of Pub. Res Code § 30231, the certified County LCP, and the federally-approved CCMP for protection of the biological productivity and the quality of coastal waters, streams, wetlands, and estuaries - of the hyporheic zone functions of those layers, through which entrained tardigrades ["water bears", "moss piglets"] in the Albian River fluvial environment are mobilized along/through subterranean flow lines between the upstream River and into into the lower Albion River Estuary, where the microscopic tardigrades serve as a key food source for juvenile (listed sensitive) Coho Salmon and Steelhead prior to their outmigration into the Pacific Ocean. In chronically water-short coastal Mendocino County, no identified or identifiable feasible alternative source for 16,000 gallons/day of construction water exists. That omission renders the DEIR/S substantively incomplete and it and the proposed project specifically inconsistent with the controlling laws, and therefore infeasible. The environmentally superior Albion River bridge preservation alternative, which we request be addressed and selected as the preferred alternative in the Supplemental DEIR/S, would avoid this substantial adverse impact on the environment.

55

9.3. Mitigation. The DEIR/S contains no finite mitigation plan and mitigation monitoring plan, but instead relies on a speculative future out-of-location and out-of-kind mitigation bank payment-for-credits scheme to pretend to offset Albion River Bridge project adverse environmental effects. We incorporate, under separate cover, our detailed comments to the US Army Corps of Engineers in opposition to that scheme, which centrally would not provide related, proportionate, and public interest (reasonable and rational) ameliorative measures to balance the identified and unidentified significant impacts of the project on sensitive species and ESHA.

56

In addition, Caltrans has a consistently demonstrated record of failing in Albion to implement the on-site impact mitigation measures to which it committed in, including, but not limited to, the proceedings of the County in CDP 2016-0034 and 2016-0038, and the California Coastal Commission in CDP 1-16-899 (Albion River Bridge geotechnical investigation grading and major vegetation removal development), CDP 1-17-730 (Albion

River Bridge project-Albion Flat archeological investigation dune grading and historic Albion River Mill bulkhead destruction) ,and CDP W-1-18-0500 (Salmon Creek Interim Lead Remediation). In each of these cases, Caltrans (a) failed to implement even the modest mitigation measures to which it agreed, (b) introduced and spread Bulbil watsonia, pampas grass, Italian thistle, other invasive weeds, and *Phytophthera* root rot organisms, (c) failed to acknowledge baseline conditions that it knowingly and intentionally altered to avoid regulatory review and required mitigations, (d) maintain or replace, as applicable, required planting/seeding mitigations, water quality BMPs, and cut or filled slope stability, (e) failed to adhere to proposed development project and Highway transportation management schedules, (f) disposed of project wastes at unpermitted and undocumented locations in aquatic, riparian, wetland, and upland sensitive habitats, and (g) failed to file or timely file required monitoring reports with relevant development regulatory agencies. The Supplemental DEIR/S should require that Caltrans specifically identify all Albion River Bridge project baseline conditions, unpermitted development and uncompleted mitigations, and set forth a detailed, funded, and enforceable full remediation plan to restore all such impacted habitats within a reasonable (short) time.

57

10. Climate Change: The DEIR/S omits description and analysis of the cumulative effects of past, current, and previous highway and bridge construction in California with concrete and newly manufactured steel on Greenhouse gas generation and resultant climate change, and the extent to which preservation of the mainly timber existing Albion River Bridge and construction and maintenance of other minor arterial highway bridges in California with renewable, sustainably harvested timber would help to contain and mitigate climate change. In tandem, the DEIR/S errs in its conclusory disclaimer that the proposed wider, straighter, accelerated Highway 1 in Albion and cumulatively along the California coast have not and would not increase highway road capacity and thus Vehicle Miles Travelled, when compared to either the environmentally superior Bridge preservation project or even the DEIR/S strawmen "no build" alternatives, each of which would function to maintain (and perhaps even incrementally reduce) VTM.

The DEIR/S also presents an outdated and superseded set of sea level (rise) scenarios based on unexamined open ocean conditions at Arena Cove, rather than on analysis of site-specific water level data from semi-sheltered Albion Cove. The DEIR/S analysis is speculative, unsupported by current best available science, and not indicative of potential water levels in or adjacent to Albion River during the next 75 years.

58

11. Community Character: The DEIR/S erroneously, without substantial evidence or analysis of relevant Albion and coastal Mendocino County socio-economic and demographic factors, limits the geospatial scope of the community that will likely be significantly (adversely) impacted by the proposed or other Build Alternative projects to U.S. Census Tract (Mendocino County) 110.01, an area that extends between and

southeasterly of Elk on the South and to Little River Cove and areas to its southeast on the North. First, the DEIR/S indicates that an unquantified (likely large) number of trucks, heavy equipment, and workers associated with the 4 to 6 year "Albion River Bridge project" will access the proposed new bridge construction and existing Bridge destruction and removal site between early morning and at night by existing narrow, variously widened, and/or new haul roads through South Albion and North Albion, including, but not limited to, Highway 1, Albion Ridge Road, South Side Albion river Road, North Side Albion River Road, Albion-Little River Road, and Spring Grove Road. The DEIR/S neither sets forth a construction traffic management plan nor analyzes the potentially significant adverse effects from that traffic between early morning and night hours during the four to six year project period on many of Albion's principal roads and streets, including, but not limited to, those that provide the only available routes to/from the Albion US Post Office, Albion Grocery, and Albion Hardware store. The DEIR/S omits description and analysis of the likely congestion, noise, dust, air pollution, and delays in South and North Albion, and in the lower Albion River Valley, from the numbers and types of diesel and gasoline-powered motorized vehicles involved in the "Albion River Bridge project", and their direct and cumulative degradation of the quiet rural Albion community, access to its roads and streets (including during cases of emergency), and local air quality.

Second, the relevant coastal Mendocino County community that Highway 1 and the Albion River Bridge serve extends from Elk landward to Navarro on the South and to beyond the northerly side of Fort Bragg-Cleone. It contains more than 500 businesses, many of which cater to visitors to this area of coastal Mendocino County. Many of the owners, workers, suppliers of goods and services, local, regional, and out-of-area customers of these priority visitor-serving businesses (especially, but not only, from the San Francisco Bay Area and beyond) travel across the Albion River Bridge and would likely incur substantial, costly, delays as a result of the four (and up to potentially six) year Caltrans "Albion River Bridge" project construction period during which one or both lanes of Highway 1 in the "Albion River Bridge project" will be variously closed, including under an ambiguous "as needed" criterion, between early morning and night time hours.

Third, local knowledge in the business community indicates that when Highway 1 and/or Highway 128 south of the Navarro Grade are closed, intermittently or for extended periods of time, that the visitors from the San Francisco Bay Area (and those from beyond it who travel up from the Bay Area) on whom the coastal economy between Albion and Mendocino depends, and the coastal economy between it and north of Fort Bragg-Cleone in substantial part depends, will incur significant reductions in demand for their goods and services, with resultant adverse effects on hours worked, incomes received, and the number of persons employed and cumulative adverse effects on community character and viability associated with those serious socio-economic dislocations.

40

Albion Bridge Stewards Comments, CT Albion River Bridge
Project DEIR/S (6/2024), September 9, 2024

59

12. Cultural Resources: The DEIR/S omits description and analysis of the preservation of the existing historic, iconic Albion River Bridge alternative, of the historic (baseline) Albion Cove bulkhead and other potential remaining artifacts in Albion Flat from the Albion Lumber Mill, and of potential Indigenous American cultural resources along south-facing Albion River bluff that the National Historic Preservation Act, as amended, requires, which renders the DEIR/S incomplete and inadequate as the "Section 4(f)" evaluation of the project and the environmentally superior preservation of the Federal- and State-listed historic existing Albion River Bridge.

60

13. Energy: DEIR/S omits cumulative impact analysis of concrete manufacturing for build alternatives and comparative total energy demand for the proposed and other "build alternative" components with the environmentally superior Bridge preservation alternatives, and thereon is incomplete and inadequate.

61

14. Geology, Soils: Notwithstanding the fractured and repeatedly failed south- and north-facing Albion River bluffs and the seaward facing Albion Cove coastal bluff, and Caltrans' performance of a subsurface geotechnical investigation of the alignment of proposed "Build Alternative 1", the DEIR/S omits presentation and analysis of that report from the latter study in 2018-2019, which renders the DEIR/S incomplete and inadequate as an environmental information document that must address and document that the proposed new bridge assure stability and structural integrity, and neither creates nor contributes significantly to erosion, geologic instability, or destruction of the site or surrounding area, or in any way requires the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. The DEIR/S thereon is incomplete and inadequate.

62

15. Greenhouse Gas Emissions: The DEIR/S fails to describe and analyze the significant direct and cumulative GHG emission impacts from construction and operation of Highway 1 not just of and on the proposed new Albion River Bridge, but also from destruction and removal of the existing Bridge and along the entire California coast, and in tandem fails to identify mitigation measures that would in relevant parts avoid them, starting with the environmentally superior preservation of the existing Albion River Bridge, and thereon is incomplete and inadequate.

63

16. Hazards: The DEIR/S fails to describe and analyze that the bluff stabilization necessary for the proposed "build alternative1" is not the least environmentally damaging alternative to mitigate identified geologic, and seismic hazards, whereas the preservation of the existing Bridge would avoid those hazards and bluff natural landform destructive actions. Data indicates that the Highway 1 T-intersections in the curve with Albion-Little River Road and North Side Albion River Road have not been the site of many collisions and, in any event, realignment of the geometry of Highway 1 and these intersections can be accomplished without building a new bridge and destroying the existing historic Bridge.

64

17. Hazardous Materials: Concrete for Build Alternatives is a hazardous material; DEIR/S contains no analysis for keeping it out of wild/scenic estuarine Albion River, Albion Cove, Albion Cove Beach, Albion Flat recreational area, including during deconstruction of the existing bridge

65

18. Hydrology, Water Quality: The DEIR/S omits description and analysis of the construction phase and build alternatives operational polluted stormwater drainage system, stream diversions (Albion River, unnamed drainage near Hwy 1-Albion-Little River Road intersection, unnamed drainage near the Hwy 1-Albion Ridge Road intersection), dewatering impacts on the Albion Flat hyporheic zone (a critical component of the Albion River juvenile salmon/steelhead estuarine system), and quantified impacts on the quality of these waters from project grading, coffer damming, construction, destruction and removal of the existing Bridge, and site-specific polluted storm water discharge controls and mitigations from the proposed project staging areas, trestles, ramps, and haul roads.

66

19. Land Use and Planning: (a) The proposed and other build alternatives are inconsistent with the development subordination requirement of Coastal Act § 30251 and LCP Policy 3.5-1, including as contained in the federally-approved California Coastal Management Program, which renders them legally unavailable and infeasible. (b) Intermittent and extended ()"as necessary", but unspecified) Highway 1 and tributary Albion road closures and blockages of navigable Albion River during 4-6 years of construction/bridge deconstruction would have significant, unmitigated direct and cumulative adverse effects on protected priority public health and safety, recreational and commercial fishing access, inconsistent with Pub. Res. Code §§ 30210 ["maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse"], 30211 ["Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation"], 20212.5 ["Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected"], 30213 ["Lower cost visitor and recreational facilities shall be protected"], 30220 ["Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses"], 30221 ["Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area"], and

30224 ["Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge"].

67

20. Noise, Vibration: Construction of the proposed and other build alternatives would generate a suite of industrial noises from numerous coincident or sequential clearing, grubbing, earthwork, pavement, bridge construction, pile driving, jack hammering, and other activities during 1-2 construction years, and bridge deconstruction sources, estimated as 94 dBA (max) for residences between early morning and night times and 101 dBA from pile driving (see DEIR/S Table 40 for ***generalized*** disaggregated equipment details per US FHWA). However, the DEIR/S does not describe or analyze peak or sustained noise pressure levels from cumulative equipment operations and during varied wind conditions in Albion River Valley, Albion River, Albion Cove, North Albion Village, South Albion Village, at Ledford House and Mendocino Coast Lodge, or in Albion generally. Pile driving would occur within 115 feet and 380 feet of existing residences, on the steep Albion River bluffs, and for some build alternatives in Albion Flat, with likely significant unmitigated and unmitigable adverse impacts on human and other sensitive receptors, unstable bluff landforms, and potentially on the foundations of older buildings and structures. The noise and vibrations from the proposed project (and other "Build Alternatives") can be avoided by preservation of the existing Bridge – the environmentally superior and preferred alternative.

68

21. Population, Housing: The DEIR/S omits description and analysis of all population segments that the build alternatives would affect, including ther size of the project work force, recreational visitors (campers, diners, sight-seers, beach users, boaters), fishers, residents, workers in the commercial recreational facilities, and of current very limited available housing (rental, vacancy) conditions in Albion and coastal Mendocino County between the Navarro River and Pudding Creek. The proposed project will therefore likely have significant adverse impacts, including through displacement of people from rental housing or lower cost visitor-serving accommodations, which the environmentally superior and environmentally preferred Bridge preservation alternative in conjunction with continued availability of the Albion Flat overnight visitor-serving facility would avoid.

69

22. Recreation: Construction would permanently or intermittently block public recreational access to and use of the Albion Flat campground, Schooner's Landing, Albion Beach, Albion Cove and the Pacific Ocean from the Albion Flat marina, Ledford House and Mendocino Coast Lodge, and substantially interfere with recreational access along Highway 1 to public and commercial recreational facilities in Albion and adjoining upcoast coastal Mendocino County, inconsistent with the aforementioned Public

Resources Code requirements. The DEIR/S also omits a terrestrial and river transportation plan for the entire period of the proposed project (and the other "build alternatives') that would further quantify these blockages and mitigations, including build alternatives avoidance, required for them

70

23. Transportation: The DEIR/S omits a detailed, quantified construction traffic management plan for the build alternatives and the proposed bridge deconstruction, generally describes likely repetitive extended lane and full bridge closures, as well as river closures, during the 4-6 year project period, and provides no substantive (related, proportionate, public interest) mitigations for these significant adverse impacts; the DEIR/S also provides no current or coastal Mendocino build-out transportation demand data or analysis regarding any need for the build alternatives; extrinsic data indicates that no such need exists now or will likely exist in the foreseeable future, given regulatory constraints on development - other than that Caltrans wishes, contrary to law, to not maintain the existing historic Bridge.

71

24. Tribal/Cultural Resources: The DEIR/S inappropriately and invalidly defers consideration of protective measures for tribal cultural resources near the toe of south-facing Albion River bluff and potentially in Albion Flat strata, and historic Albion River Mill bulkhead and other built cultural resources in and along Albion Flat to the Final EIR/EIS, when opportunity for public comment has closed. Proposed bluff stabilization is also not the least environmentally damaging alternative, given that the environmentally superior and preferred preservation of the historic Bridge avoids that significant landform alteration.

72

25. Utilities, Service Systems: The DEIR/S neither describes nor analyzes a storm water control system for the proposed or other "build alternatives". Extraction of water from the Albion Flat hyporheic zone, reliance on limited local water supplies, and importation of water for construction in chronically water-short coastal Mendocino County constitute a significant adverse project effect on the environment and sensitive species that render the built alternatives infeasible. The environmentally superior and preferred preservation of the historic Bridge avoids those impacts.

73

26. Wildfire: The DEIR/S finding of no project impact on Albion-Little River FD for protection services is unsupported by analysis of (1) a site-specific plan for joint use of the proposed project staging area and FD egress/ingress to Station 810 between Highway 1 and the South Albion Village commercial core, or (2) emergency response plans during delays in critical response timelines for firefighter arrival at Station 810 (or other FD Stations), and first response or cascading equipment and firefighters from the several FD stations to a wildfire (or other incident) that requires transiting backed-up traffic on Highway 1, tributary County roads, or crossing of the Bridge during one-lane or two-lane closures while construction is underway for 4-6 years.

74

27. Conclusion: The DEIR/S is substantively incomplete, variously inaccurate, inconsistently identifies the proposed Build Alternative 1 project and disclaims the existence of any proposed project at this DEIR/S stage, and critically omits description and fair analysis of the environmentally superior (environmentally preferred, least environmentally damaging) feasible alternative, which consist of preservation of the historic Albion River Bridge through historically consistent and sustainable maintenance, repairs as necessary, completion of the seismic retrofit, and appropriate pedestrian-bike way and bridge road deck drainage enhancements.

The DEIR/S is fatally flawed and infeasible. We respectfully Caltrans to withdraw it, engage in substantive consultation with us, other stakeholders, and the public about the only feasible – Bridge preservation – alternative, and transparently prepare a new environmental document that fully conforms to CEQA, NEPA, and all other applicable laws.

Thank you for this opportunity to comment on the "Albion River Bridge project" DEIR/S.

Respectfully submitted on behalf of the Albion Bridge Stewards (by authorized electronic signatures):

Maria Hansen **Bill Heil** **Tom Wodetzki** **Jim Heid**

EXHIBIT 1. LIST OF DEIR/S COMPONENTS AND WEB SITE ADDRESSES

Caltrans has posted the electronic form of the DEIR/S to its web site, at: https://www.albionriverbridgeproject.com/resources/ .

The electronic DEIR/S consists of three parts (2,991 enumerated pages total):

1. The "Draft EIR/EIS and Draft Section 4(f) Evaluation"(664 pages, posted at: https://www.albionriverbridgeproject.com/resources/test/);

2. "Appendices" ("A"-"M", 597 pages, posted at: https://www.albionriverbridgeproject.com/resources/appendices/);

3. The following 20 individual "Technical Studies" (1,730 pages, total):

Air Quality Report (58 pages, posted at: https://www.albionriverbridgeproject.com/resources/air-quality-report/);

Community Impact Assessment (195 pages, posted at: https://www.albionriverbridgeproject.com/resources/community-impact-assessment/);

Structures: Draft Final Hydraulic Report (30 pages, posted at: https://www.albionriverbridgeproject.com/resources/draft-final-hydraulic-report-pdf/)

Draft Hydraulics and Sediment Analysis Report (66 pages, posted at: https://www.albionriverbridgeproject.com/resources/draft-hydraulics-and-sediment-analysis-report/);

Energy Analysis Memorandum (5 pages, posted at; https://www.albionriverbridgeproject.com/resources/energy-analysis-memorandum/);

Initial Site Assessment (2022) (319 pages, posted at: https://www.albionriverbridgeproject.com/resources/initial-site-assessment-2022/);

Initial Site Assessment (2023) (6 pages, posted at: https://www.albionriverbridgeproject.com/resources/initial-site-assessment-2023/);

Location Hydraulic Study (4 pages, posted at: https://www.albionriverbridgeproject.com/resources/location-hydraulic-study/);

Natural Environment Study (808 pages, posted at: https://www.albionriverbridgeproject.com/resources/natural-environment-study/);

Noise Study Report (58 pages, posted at: https://www.albionriverbridgeproject.com/resources/noise-study-report/) ;

Paleontological Identification Report/Paleontological Evaluation Report (39 pages, posted at: https://www.albionriverbridgeproject.com/resources/noise-study-report-cloned-2068/);

Preliminary Drainage Report (11 pages, posted at: https://www.albionriverbridgeproject.com/resources/preliminary-drainage-report/);

Public Access Feasibility Study [limited to navigable river access] (20 pages, posted at: https://www.albionriverbridgeproject.com/resources/public-access-feasibility-study/);

Relocation Impact Report (1 page, posted at: https://www.albionriverbridgeproject.com/resources/relocation-impact-memorandum/);

Revised Preliminary Foundation Report (12 pages, posted at: https://www.albionriverbridgeproject.com/resources/revised-preliminary-foundation-report-pdf/);

Sand Supply Memorandum (9 pages, posted at; https://www.albionriverbridgeproject.com/resources/sand-supply-memorandum/);

Traffic Data and Designation Request Memorandum (1 page, posted at: https://www.albionriverbridgeproject.com/resources/traffic-data-and-designation-request-memorandum/);

Visual Impact Assessment (46 pages, posted at: https://www.albionriverbridgeproject.com/resources/visual-impact-assessment/);

Water Quality Assessment Report (27 pages, posted at: https://www.albionriverbridgeproject.com/resources/water-quality-assessment-report/); and

Wild and Scenic Rivers Report (15 pages, posted at: https://www.albionriverbridgeproject.com/resources/wild-and-scenic-rivers-report/).

2. ILLUSTRATIVE OBLIQUE AERIAL PHOTOGRAPH (BY TOM WODETZKI, 2015) OF THE ICONIC ALBION RIVER BRIDGE IN THE CONTEXT OF THE LOWER ALBION RIVER VALLEY, ADJACENT NORTH ALBION AND SOUTH ALBION, ALBION COVE, THE ALBION HEADLANDS, AND THE NEARSHORE EASTERN PACIFIC OCEAN (Used by permission)

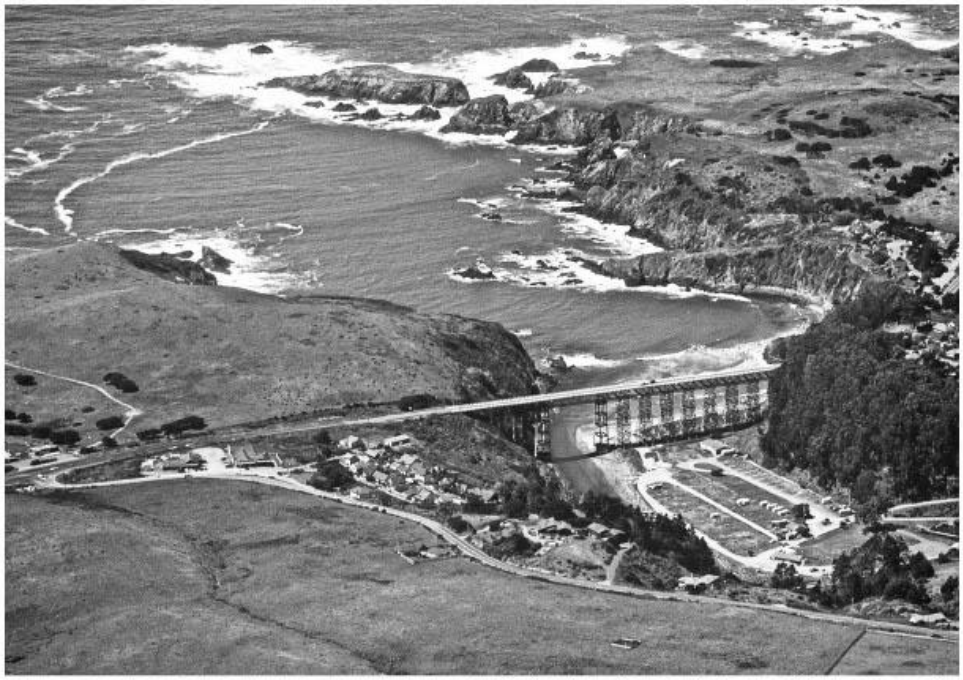
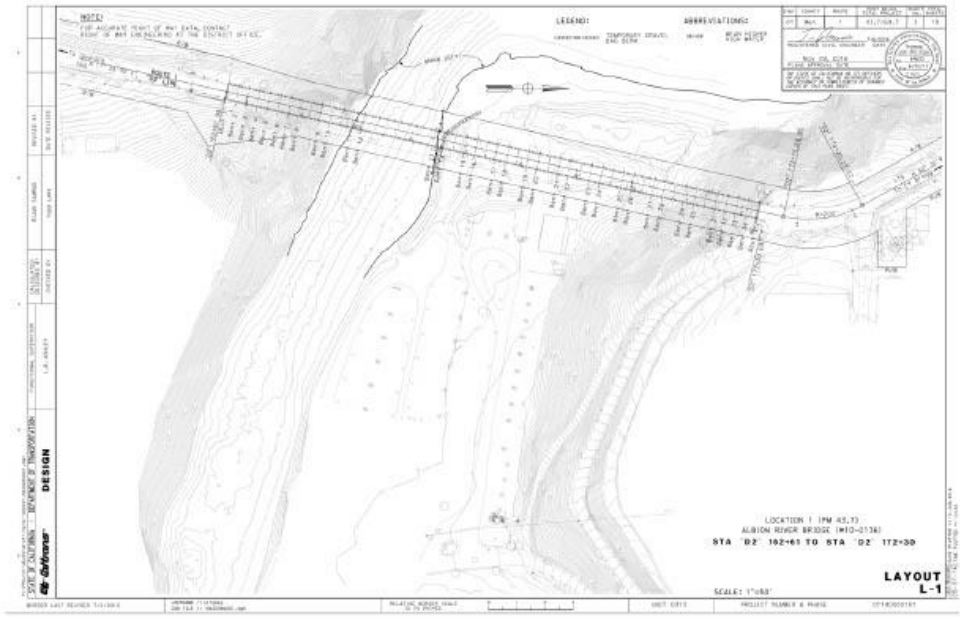


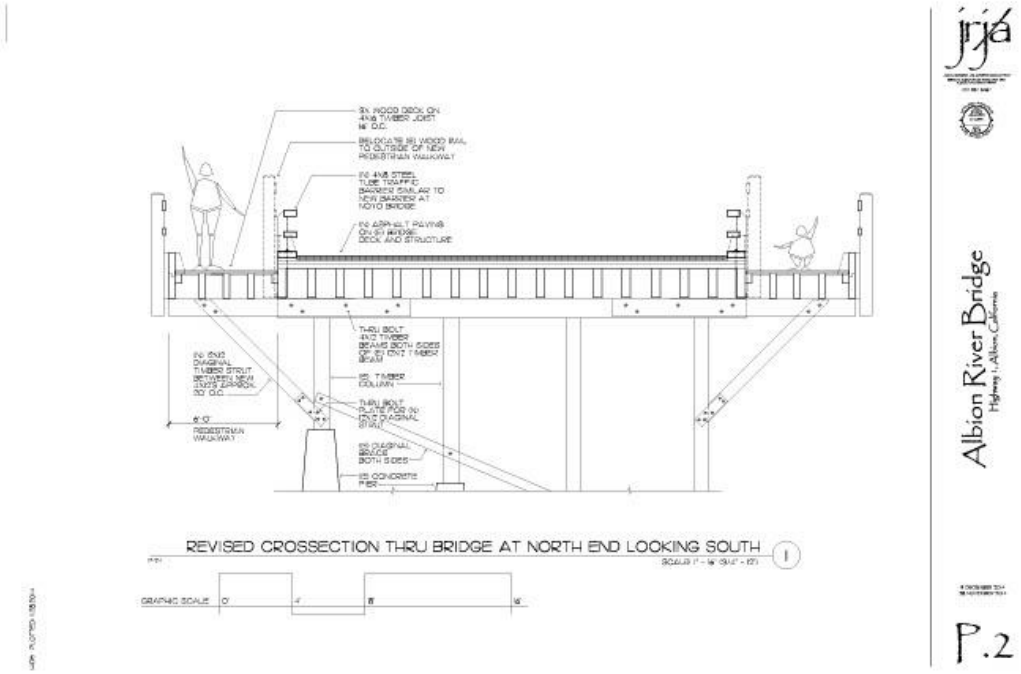
EXHIBIT 3. CALTRANS TOPOGRAPHICAL MAP (2016) OF THE LOCATION IN PLAN VIEW OF THE ICONIC ALBION RIVER BRIDGE IN LOWER ALBION RIVER VALLEY, WITH HIGHWAY 1, THE WILD AND SCENIC ALBION RIVER, ALBION FLAT, ALBION COVE BEACH, ALBION COVE, NORTH AND SOUTH ALBION HEADS (PARTS)



49

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

EXHIBIT 4. ILLUSTRATIVE CROSS-SECTION BY ARCHITECT JOHN JOHANSEN OF THE CANTILIVERED PEDESTRIAN AND BICYCLE WAYS ON THE HISTORIC TIMBER ALBION RIVER BRIDGE



50

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

EXHIBIT 5. NORTH SIDE ALBION RIVER ROAD AREA PRELIMINARY PLANT LIST

Binomial	Common Name	Native?
Agrostis hallii	Hall's bentgrass	yes
Calystegia purpurata ssp. purpurata	coast morning glory	yes
Castilleja affinis	Indian paintbrush	yes
Abies grandis	grand fir	yes
Achillea millefolium	yarrow	yes
Aesculus californica	California buckeye	yes
Allium triquetrum	wild onion	no
Alnus rubra	red alder	yes
Amaryllis belladona	Naked Lady	no
Anaphalis margaritacea	pearly everlasting	yes
Angelica hendersonii	Henderson's angelica	yes
Anthoxanthum odoratum	sweet vernal grass	no
Athyrium felix-femina var. cyclosorum	lady fern	yes
Avena sp.	Wild Oats	no
Baccharis pilularis ssp consanguinea	coyote bush	yes
Briza maxima	rattlesnake grass	no
Bromus diandrus	rip-gut	no
Bromus hordeaceus	soft chess	no
Bromus sitchensis var. carinatus	California brome	yes
Carduus pycnocephalus ssp. Pycnocephalus	Italian thistle	no
Cirsium brevistylum	western thistle	yes
Cirsium vulgare	bull thistle	no
Cortaderia jubata	pampas grass	no
Corylus cornuta ssp. californica	California hazelnut	yes
Cotoneaster lacteus	late cotoneaster	no
Crocosmia X crocosmiiflora	Montbretia Lily	no
Cymbalaria muralis	kenilworth ivy	no
Dactylis glomerata	orchard grass	no
Delairea odorata	cape Ivy	no
Diplacus aurantiacus var. aurantiacus	sticky monkeyflower	yes
Distichlis spicata	Salt-grass	yes
Dryopteris arguta	wood fern	yes
Echium pininana	tower of jewels	no
Elymus glaucus ssp glaucus	blue wildrye	yes
Epilobium ciliatum spp. ciliatum	American fireweed	yes
Erigeron glaucus	seaside daisy	yes
Eriophyllum staechadifolium	seaside wooly sunflower	yes
Eschscholtzia californica	California poppy	yes
Eucalyptus globulus	blue gum eucalyptus	no
Euphorbia peplus	petty spurge	no

51

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

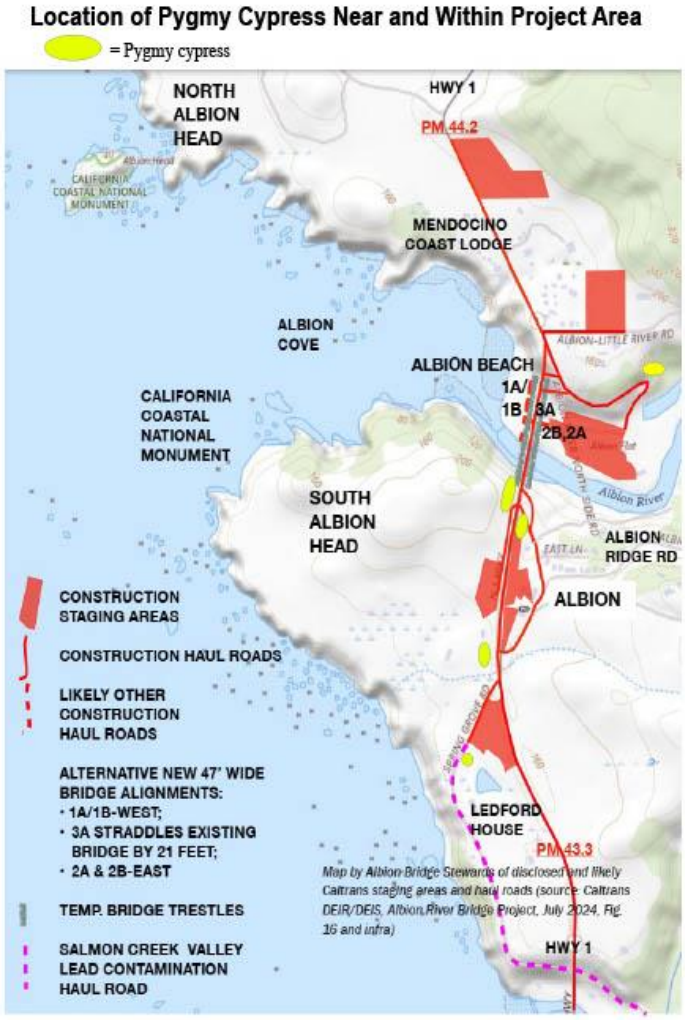
Festuca perennis	perennial ryegrass	no
Fragaria vesca	wood strawberry	yes
Frangula californica	coffeeberry	yes
Frangula purshiana ssp purshiana	cascara sagrada	yes
Galium aparine	bedstraw	yes
Galium triflorum	sweet-scented bedstraw	yes
Garrya elliptica	silk tassel bush	yes
Genista monspessulana	French broom	no
Geranium molle	wild geranium	no
Hedera helix	English ivy	no
Heracleum maximum	cow parsnip	yes
Hesperocyperus pygmaea	pygmy cypress	yes
Holodiscus discolor var. discolor	ocean spray	yes
Hypochoeris radicata	coast dandelion	no
Ilex aquifolium	English holly	no
Iris douglasiana	Douglas iris	yes
Lathyrus vestitus var. vestitus	wild pea	yes
Leontodon saxatilis	hawkbit	no
Lonicera hispidula	twining honeysuckle	yes
Lonicera involucrata var. ledebourii	twinberry	yes
Lotus corniculatus	bird's foot trefoil	no
Lupinus arboreus	bush lupine	yes
Madia sativa	Coast Tarweed	yes
Maianthemum stellatum	slender false Solomon's seal	yes
Marah oregana	coast man-root	yes
Matricaria discoidea	pineapple weed	yes
Modiola caroliniana	modiola	no
Morella californica	wax myrtle	yes
Myosotis latifolia	forget-me-not	no
Notholithocarpus densiflorus var. densiflorus	tan oak	yes
Oemleria cerasiformis	oso berry	yes
Osmorhiza berteroi	sweet cicily	yes
Pentagramma triangularis ssp. triangularis	gold-backed fern	yes
Plantago coronopus	cut-leafed plantain	no
Plantago lanceolata	English plantain	no
Polystichum munitum	western sword fern	yes
Pseudotsuga menziesii var. menziesii	Douglas fir	yes
Pterideum aquilinum var. pubescens	bracken fern	yes
Raphanus sativus	wild radish	no
Ribes sanguineum var. glutinosum	Pink Flowering Currant	yes
Rosa gymnocarpa	wood rose	yes
Rubus parviflorus	thimbleberry	yes

52

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

Rubus ursinus	California blackberry	yes
Rumex acetosella	sheep sorrel	no
Rumex crispus	curly dock	no
Rumex sp.	dock	
Rytidosperma penicillatum	Australian oatgrass	no
Sanicula crassicaulis	snakeroot	yes
Scrophularia californica	California figwort	yes
Senecio minimus	Australian fireweed	no
Sequoia sempervirens	coast redwood	yes
Solanum americanum	American nightshade	yes
Sonchus oleraceus	sow thistle	no
Sphaerophorus globosus	Lichen	yes
Stachys rigida var. quercetorium	horse mint	yes
Stellaria media	chickweed	no
Taraxacum officinale	dandelion	no
Torilis arvensis	tall sock-destroyer	no
Trifolium repens	white clover	no
Trillium ovatum	trillium	yes
Vicia hirsuta	vetch	no
Vicia sativa ssp. nigra	Narrow-leaved vetch	no
Vinca major	periwinkle	no

EXHIBIT 6. PROPOSED ALBION RIVER BRIDGE STAGING AREAS, HAUL ROADS, TRESTLES, BUILD ALTERNATIVES 1A-1B ALIGNMENT, SALMON CREEK LEAD PROJECT HAUL ROAD, AND LOCATIONS OF PYGMY CYPRESSES WITHIN/NEAR THE PROJECT



54

Albion Bridge Stewards Comments, CT Albion River Bridge Project DEIR/S (6/2024), September 9, 2024

Response to the Albion Bridge Stewards

1. Costs provided in the document were based on the most accurate data at the time of document preparation. The change in project cost does not affect the analysis. Project costs would be finalized after project approval during the design and permitting phase of the project.
2. Caltrans notes your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The alternatives currently under consideration include a No-Build (No-Action) Alternative and three Build Alternatives:

   - Alternative 1 (West Alignment; Design Options 1A and 1B)
   - Alternative 2 (East Alignment; Design Options 2A and 2B)
   - Alternative 3 (On-Alignment; Design Option 3A)

   The Environmentally Superior Alternative is identified in the environmental document (ED) as Design Option 2B. See Section 2.3.1, *Environmentally Superior Alternative*. Design Option 2B (East Arch) has been identified as the preferred alternative.
3. ED Figure 33 shows the aerial image of the existing bridge with key view locations used in the Visual Impact Assessment. The red dot identifying the "Project Location" is a general identifier of the project location and it is not intended to represent a specific project alternative. ED Appendix J, *Sensitive Habitat Impact Maps,* shows impacts to sensitive habitats for each of the project design options. The final ED includes the identified preferred alternative; see ED Section 2.4, *Identification of a Preferred Alternative.* Design Option 2B (East Arch) is the identified preferred alternative.
4. Early and continuing coordination with the public and public agencies is an essential part of the environmental process. See ED Chapter 5, *Comments and Coordination*, which summarizes the results of Caltrans' efforts to fully identify, address, and resolve project-related issues through early and ongoing coordination.
5. Caltrans has complied with all requirements of CEQA and NEPA. Further, the required studies and technical analyses were prepared; see ED Appendix H, *List of Technical Studies,* and the references to these studies are documented throughout the ED. Non-confidential technical studies are available to the public for review online or via mail if requested.
6. Information on the valid purpose and need and project alternatives are identified in Chapter 1, *Proposed Project*, and Chapter 2, *Project Alternatives*.

7. The Environmentally Superior Alternative is identified as Design Option 2B. See ED Section 2.3.1. See ED Section 2.2, *Project Alternatives*, for visual simulations and maps of the proposed design options. Design Option 2B (East Arch) has also been identified as the preferred alternative.
8. Within Chapter 3 of the environmental document, existing conditions for each environmental resource area are described in the Affected Environment section for that resource. Preceding, current, and reasonably foreseeable development projects are identified in Section 3.7, *Cumulative Impacts*.
9. The environmental document has fully analyzed all feasible build alternatives, including the environmentally superior alternative; (ED Section 2.3.1). A cumulative impact analysis was conducted and can be found in section 3.7, *Cumulative Impacts.*
10. Enforceable AMMs have been presented throughout the ED and can be found compiled/described in Appendix D, *Avoidance, Minimization, and/or Mitigation Summary.*
11. The ED is a valid CEQA/NEPA document and complies with all applicable state and federal laws, regulations and requirements.
12. The ED is in compliance with all applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/Quality Control to ensure the document satisfied all legal requirements. In addition, Caltrans has had a robust public engagement history that involved the Albion Bridge Stewards and other stakeholders as described in Chapter 5 of the ED.

    No efficiencies would be realized to prepare an analysis on an alternative that was considered but rejected. See Response 13 below.

    The ED was circulated for public review for 90 days, with the document available electronically as well as in print (available at local libraries as well as provided upon request). The meetings held for the project were noticed, and subsequently made available online. See ED Section 5.5, *General Public,* for additional information.
13. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6*, Alternative 4 (Rehabilitation Alternative)* and Appendix I. A final EIR/EIS has been prepared pursuant to CEQA and NEPA. Public engagement will continue to be ongoing. Caltrans has acknowledged the Albion Bridge Stewards as a consulting party in matters that relate to Section 106 of the National Historic Preservation Act. Caltrans has solicited input from consulting parties; see ED Chapter 5 for a summary.

    See also Responses 4 through 12 above.
14. As stated in your comment, the existing bridge is not curved. The alignments north and south of the bridge do follow the coast and have radius to them.

Clarification has been added to the document in ED Section 3.2.9, *Traffic and Transportation/Pedestrian and Bicycle Facilities, Affected Environment.*

15. Caltrans has consulted with the California Natural Resources Agency (CNRA), the official with jurisdiction over the California-designated Wild and Scenic Albion River (Recreational), and the California Wild and Scenic Rivers Act would not be triggered (see ED Section 5.3, *Agency Consultation and Coordination*).

    The project would not result in permanent adverse effects on the free-flowing characteristics and would not alter the Albion River's ability to meet its recreational designation under the California Wild and Scenic Rivers Act as described in Section 3.2.4 *Wild and Scenic Rivers.*

16. There is no requirement for an ED to contain a topographic map of the project study area.

17. The bridge is seismically deficient pursuant to American Association of State Highway and Transportation Officials (AASHTO) standards for a state highway system bridge, which leaves it susceptible to catastrophic failure or "collapse" during an earthquake. We are unable to predict when a catastrophic event would occur. Regarding the 2002 truck strike, it was by chance that no columns were taken out and only a few cross-bracing members affecting the stability of the bridge were damaged. The fact that a truck went over the bridge rail shows its vulnerability.

    The Albion River Bridge does not have a weight limit for legal trucks. However, the current vehicular live load carrying capacity of the bridge is not sufficient for routing most annual permit loads, such as oversize/overweight vehicles (e.g., mobile cranes, large tow-recovery vehicles, and many of the more "standard" permit trucks such as construction equipment haulers). The bridge is one of two locations on SR 1 that restricts permitted loads. See also the discussion on substandard live load carrying capacity in Appendix I. AASHTO and Caltrans' Seismic Design Criteria require that rehabilitated and newly constructed bridges meet current load rating design standards. Eliminating the existing bridge's structural deficiencies, including substandard live load carrying capacity, is one of the many project objectives the rehabilitation alternatives fail to satisfy.

18. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

    The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose.* See also Master Response 1 (Rehabilitation).

19. Comment on CEQA requirements is noted.

20. Feasible alternatives that meet the purpose, need and objectives of the proposed project have been analyzed in the ED, as well as feasible avoidance, minimization, and mitigation measures. Alternatives considered but eliminated from further discussion have been described in ED Section 2.5, *Alternatives Considered but Eliminated from Further Discussion* and Appendix I.

21. The ED does contain a valid purpose. The purpose presents objectives to address and why the project is needed. The purpose is used to develop and evaluate potential solutions, with a range of achievable, unbiased alternatives. See Response 18 above and ED Section S.2.3 and 1.4.1.

22. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards).

    The bridge is seismically deficient pursuant to AASHTO standards for a state highway system bridge, which leaves it susceptible to catastrophic failure or "collapse" during an earthquake. Modern seismic standards for new bridge construction must meet Caltrans' stringent Seismic Design Criteria, wherein seismic-critical members may sustain damage during a seismic event without leading to structural collapse or loss of structural integrity. A seismic retrofit of the bridge would include restraining devices to make the bridge more resistant to failure in the event of an earthquake. However, a seismic retrofit still allows for a rocking motion in the bridge during an earthquake to dissipate energy and does not meet the same modern seismic performance standards of a new bridge. Eliminating seismic deficiencies is one of the many project objectives.

23. The bridge is fracture critical due to no redundancy of the riveted steel deck truss main span. If key structural connections or components are compromised, then the bridge could fail during a seismic event or under heavy cyclical loads as described in ED Section 1.4.2.

24. Objectives in the ED have been modified to state Local Coastal Plan "goals".

25. While the bridge is not curvilinear, the roadway north and south are. Correcting the non-standard turn condition north of the bridge was one of many deficiencies identified in the ED. Please see Section 1.4.3, *Deficiencies in the Existing Bridge*, and 3.2.9 for a description of the curvilinear roadway.

26. The ED provides a reasonable range of project alternatives. The addition of a cantilevered walkway to the existing bridge to provide pedestrian access is not a viable option as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was eliminated from further consideration. However, a Rehabilitation with Widening option involving wider shoulders was considered (see ED Section 2.5.6); although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider

shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

27. The steel reinforcement in a replacement bridge is epoxy coated and encased in concrete, protecting it from the harsh marine environment. Concrete with supplementary cementitious materials and admixtures is able to perform very well in marine environments and requires very little maintenance, primarily consisting of periodic deck overlay repairs and joint replacements. The existing bridge on the other hand exposes its timber and steel truss members and connection elements directly to the environment causing escalated amounts of decay.

    Under the No-Build Alternative, the proposed project would not occur and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, seismic events, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. Therefore, the cost of maintaining the existing bridge in its current state will continue to increase moving forward. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. See Section 2.2.1, *No-Build (No Action) Alternative*.

    Minimizing ongoing maintenance costs is one of the many project objectives that the No-Build Alternative, as well as the rehabilitation options, fail to satisfy.

28. The bridge is in a state of deterioration where traffic delays and closures moving forward cannot be predicted. Even with ongoing maintenance, eventual replacement would be needed. Initial estimates revealed that rehabilitation would require an estimated 100 days of extended nighttime closures in addition to a 55-hour bridge closure to facilitate replacement of the steel truss, as compared to the Build Alternatives which only propose one extended nighttime closure and no 55-hour closure. See ED section 3.2.9, *Traffic and Transportation*, for more information.

29. The Ocean Protection Council's (OPC) State of California Sea Level Rise Guidance is the basis for both internal sea-level rise (SLR) guidance as well as the California Coastal Commission's SLR guidance document and as such is sufficient for transportation project level analysis. As described in ED Section 4.5.5, *Adaptation*, SLR projections were reported using the 2018 OPC SLR Guidance Manual, which was the guidance at the time environmental baseline studies were performed. The OPC Guidance was updated in 2024, including SLR scenarios; in 2100, the Intermediate-High SLR scenario projection for the station at Arena Cove is 4.5 feet, and the High SLR scenario is 6.4 feet. The updates do not affect the analysis, and the identified preferred alternative will still be resilient

to SLR impacts within the design life of the bridge. Note that under the OPC guidance, the first step is to identify the tide gauge closest to the project area, so that SLR scenarios incorporate localized effects of vertical land motion. The Arena Cove tide gauge location was used for the project as it is closest to the project area. See ED Section 4.5.5.

Appropriate baseline conditions were considered. The baseline for the CEQA analysis is the existing physical conditions at the time that the technical studies were prepared or conducted, except where noted.

With the exception of the lower concrete portion of the existing pier on the north bank, which is being retained to maintain current geomorphic processes, the existing pier foundations (pilings) would be removed three feet below the finished grade pursuant to Standard Measure **HF-2**, consistent with the Caltrans Bridge Removal Manual and Standard Specifications.

30. An Asbestos, Lead-Containing Paint, and Treated Wood Survey (June 2014) and a Preliminary Site Investigation (December 2014) indicated that the chemical preservative treatment (Wolman Concentrate 72%) is leaching from the timber members and has impacted shallow soil and groundwater immediately adjacent to the bridge foundations. Contaminants of potential concern consist of arsenic, chromium, hexavalent chromium, and lead. Furthermore, a Preliminary Endangerment Assessment (PEA) Report (July 2017) was completed in consultation with the Department of Toxic Substances Control (DTSC), and the result of assessment indicates no excess human health risk is posed by the potential contaminants of concern in areas outside of the right of way, though contaminants are being released into the soil above screening levels thought to be protective of the environment. The PEA Report recommended removal of the source of arsenic (i.e., bridge structure) to eliminate releases and the potential threat they present. See ED Section 2.2.5, *Common Design Features of the Build Alternatives,* and Section 3.3.5, *Hazardous Waste/Materials,* for additional information on hazardous waste.

31. A comprehensive environmental analysis for the proposed project was completed. The construction emission model used for the project-specific air quality analysis includes emission estimates from on-road and off-road sources during construction. The on-road source category includes emissions from trucks used to transport materials to the construction site. The ED identifies measures to avoid and minimize environmental impacts to air quality, community, and hazardous waste disposal during construction.

32. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. The environmentally superior alternative, Design Option 2B, is discussed in Section 2.3.1. See also Master Response 1 (Rehabilitation).

33. The ED does contain a valid need. The project need establishes evidence of a transportation problem or deficiency, is factual and quantifiable, identifies a problem that is fixable/solvable, and justifies logical termini.

The need statement was developed to address the transportation deficiency. At the time the need statement was developed, and to this day, the bridge is in a poor and deteriorating condition.

34. The ED concludes that the existing bridge is deficient based on bridge inspection reports. The proposed project is needed to address the functional, safety, and structural deficiencies of the bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

35. Maintenance repairs or seismic upgrades only would not satisfy the purpose, need or objectives of the proposed project. The addition of a cantilevered walkway to the existing bridge to provide pedestrian access was not an option that was considered as there is no approved barrier that that could connect to the existing bridge's timber deck to protect pedestrians from traffic.

36. The Albion River Bridge does not have a weight limit for legal trucks. However, the current vehicular live load carrying capacity of the bridge is not sufficient for routing most annual permit loads, such as oversize/overweight vehicles (e.g., mobile cranes, large tow-recovery vehicles, and many of the more "standard" permit trucks such as construction equipment haulers). The bridge is one of two locations on SR 1 that restricts permitted loads. See also the discussion on substandard live load carrying capacity in Appendix I. AASHTO and Caltrans' Seismic Design Criteria require that rehabilitated and newly constructed bridges meet current load rating design standards. Eliminating the existing bridge's structural deficiencies, including substandard live load carrying capacity, is one of the many project objectives that rehabilitation alternatives fail to satisfy.

37. The Albion River Bridge was originally proposed to be a concrete arch structure design and was abandoned due to concrete and steel shortages during World War II, and the bridge was redesigned to predominantly use timber with a steel truss. The existing bridge exposes its wooden and steel truss members and connection elements directly to the environment causing escalated amounts of decay.

    In contrast, the steel reinforcement in a replacement bridge is epoxy coated and encased in concrete, protecting it from the harsh marine environment. Concrete with supplementary cementitious materials and admixtures is able to perform very well in marine environments and requires very little maintenance, primarily consisting of periodic deck overlay repairs and joint replacements. Minimizing ongoing maintenance costs is one of the many project objectives.

38. The bridge is seismically deficient as it is susceptible to catastrophic failure or "collapse" during an earthquake. Modern seismic standards for new bridge construction must meet Caltrans' stringent Seismic Design Criteria, wherein seismic-critical members may sustain damage during a seismic event without leading to structural collapse or loss of structural integrity.

39. The bridge is fracture critical due to no redundancy of the riveted steel deck truss main span. If key structural connections or components are compromised, then

the bridge could fail during a seismic event or under heavy cyclical loads as described in ED Section 1.4.2.

40. The project objectives include providing safe, multimodal bridge access for bicyclists and pedestrians and to provide shoulder widths consistent with local coastal plan (LCP) goals. One-foot shoulders do not achieve the LCP goals.

41. The addition of a cantilevered walkway to the existing bridge to provide pedestrian access was not an option that was considered as there is no approved barrier that could connect to the existing bridge's timber deck to protect pedestrians from traffic. However, one of the rehabilitation options considered involved wider shoulders. See Section 2.5.

42. Eliminating the structural deficiencies of the bridge, which includes the external wooden barrier rail that is incapable of resisting current vehicle impact loading requirements, is one of the many project objectives identified in the ED.

43. Even with ongoing maintenance, a full rehabilitation would be needed. This would require 100 extended nighttime closures, a 3-day continuous closure to replace the steel truss span, and many unknowns possibly leading to additional closures. The need states the bridge requires extensive preventative maintenance. With respect to traffic impacts associated with on-going maintenance of the existing bridge, maintenance obligations are anticipated to increase over time and the risk of potential bridge collapse or failure would continue. Minimizing detours or traffic delays associated with bridge inspection, maintenance, and repairs is one of the project objectives identified in the ED.

44. Climate change is steadily increasing the stress and exposure that infrastructure is experiencing. Climate change is increasing the severity, frequency, and duration of these events. Therefore, one of the project's objectives is to improve resilience to sea level rise, storm surges, and tsunamis. There is a need to reduce the susceptibility of the current structure to tsunami damage, which includes debris loading. More bridge supports in the tsunami inundation zone increases the likelihood of debris loading with more intense and frequent storms. The proposed project would result in a bridge that is more resilient to debris loading, as it involves fewer piers/foundations, is positioned to minimize encroachment on the floodplain, and includes more structurally resilient materials than the existing bridge.

45. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which identify a maintenance schedule for the bridge. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics. Minimizing ongoing maintenance costs is one of the project objectives identified in the ED.

46. See Response 30.

47. Caltrans notes that the commenter referenced Coastal Act Coastal Act Policy 30521, but likely meant to reference Policy 30251. The proposed Build Alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.5-1 and all other coastal policies stated in Table 9 of the ED.

    The identified preferred alternative (Design Option 2B – East Arch) would allow for expansive views beyond the bridge. The arch design frames the view of the river inlet for boaters and river recreationists, removing the extensive wooden beams and opening the view of natural coastal features. The arch design is also consistent with other bridges along the SR 1 coast.

    The proposed project would be consistent with the current highway user's view of rural scenic characteristics of the present roadway, and would maintain a two-lane, scenic rural highway once construction is complete consistent with the Local Coastal Plan. The Visual Impact Assessment (VIA) was prepared pursuant to requirements of NEPA and CEQA. It was based on the guidance provided in the Caltrans Visual Impact Assessment Handbook which does not specify the number of key views required or that elevation views need to be considered. Key views were selected to be representative of the range of views that could be affected by the build alternatives and the VIA explains why each key view location was chosen. The VIA, and the analysis in the Draft EIR/EIS in Section 3.2.10, *Visual/Aesthetics,* contains an adequate number of key views to demonstrate that the proposed bridge design does not impart an effect or impact on visual/aesthetic resources.

    Proposed avoidance, minimization and/or mitigation measures are based on similar bridge projects whose measures have been certified and implemented. During the design phase of the project, the aesthetic treatment (such as colors, textures, and/or patterns) for the bridge and retaining walls would be selected to blend the structures in with the surrounding environment.

48. The Air Quality Report includes a wind rose for the "all weather" condition at the Little River Airport which shows predominant wind patterns near the project. However, the type of analysis conducted for construction emissions was not reliant on wind data. Control measures at the source would prevent fugitive dust issues in the surrounding community (see ED Section 3.3.6, *Air Quality,* and **AMM-AQ-1**).

    The Revegetation Plan would be developed after the final environmental document and would include permit-driven revegetation. As described in Standard Measure **BR-4(B)**, a Revegetation Plan would be prepared which would include a plant palette, establishment period, watering regimen, monitoring requirements, and pest control measures. Also, in accordance with Standard Measure **WQ-1** and SWPPP requirements**,** construction site BMPs and erosion control measures would be implemented during and post construction.

    Water for dust control would likely be supplied by on-site construction dewatering operations, local fire hydrants, and/or water-use agreements with a local water district, mutual water company, business, and/or residence. Minimization measures, such as for **AMM-AQ-1**, would be enforceable through the

construction contract and local air district compliance. The contractor would prepare a dust control plan that would be reviewed and approved by Caltrans.

49. The environmental document discusses baseline biological conditions in the *Affected Environment* subsections of Section 3.4, *Biological Environment*, and impacts to biological resources in the *Environmental Consequences* subsections. Additional detail on baseline conditions and impacts is included in the Natural Environment Study (NES) prepared for the project, which is publicly available, and hardcopies were provided upon request. Section 3.4 also discusses project features, standard measures, as well as additional measures that would be used to avoid, reduce, and offset impacts on biological resources. Cumulative impacts are discussed in Section 3.7, *Cumulative Impacts.*

    The ED identifies that impacts to biological resources are less-than-significant with mitigation under CEQA. See Section 4.3.4, *Biological Resources.* A list of the avoidance, minimization, and/or mitigation measures, as well as additional information on biological mitigation for the project, is provided in Appendix D, *Avoidance, Minimization, and/or Mitigation Summary.* As shown in Appendix D, Caltrans has committed to mitigation for this project, identified types of potential actions to mitigate significant impacts, and identified mitigation objectives as required by CEQA.

50. Due to repeated comments on the same or similar themes, responses to comments on pages 20 through 36 (encompassing Section 9.1 of the letter) have been grouped by general topic, including botanical surveys, project details, ESHAs, and plants and natural communities, to avoid excess duplication of responses.

    Surveys

    Caltrans notes that the commentor conducted its own surveys, which included areas outside the project's study area, such as in the area of the serviceberries and viola depicted on page 33 of the comment letter.

    Protocol-level surveys were conducted by qualified personnel throughout the ESL as well as the BSA where landowner permission to access was granted in 2013, 2014, 2020, 2021, and 2023. Protocols included CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* for floristic surveys and A Manual of California Vegetation, second edition, and online updates for vegetation classification. Protocol-level surveys focus on the blooming period of special status plant species, which are included in Appendix L, *Special Status Plant Species with the Potential to Occur in the Project Vicinity*.

    Multiple surveys were conducted to capture the potential variation in species, and future surveys will be conducted to capture changes over time. In accordance with CDFW protocols, seasonally appropriate pre-construction surveys for sensitive plant species would be conducted by a qualified biologist (Standard Measure **BR-4[A]**).

ESHAs

Project surveys included the review of a 100-foot buffer around the ESL (the project BSA) to determine if ESHAs are within or adjacent to the project area. The California Coastal Act (CCA) defines Environmentally Sensitive Habitat Areas (ESHAs) as "…any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." It is important to note that there are three parts to this definition. Habitats that are considered ESHA are made on a case-by-case basis and require input from the California Coastal Commission (CCC). Potential ESHA and project impacts are discussed in Section 3.4.1, *Natural Communities.* A detailed ESHA Analysis would be prepared and submitted to the CCC during the permitting phase of the project.

CCC requirements for development within Mendocino County are implemented through the county's LCP. It is anticipated that the Coastal Development Permit (CDP) for the project would be consolidated to the CCC for this project. While Mendocino County's LCP would be used as guidance as a regional plan that implements state requirements, the CCA would be used as the standard of review for the project.

While setbacks may be required for ESHA, any setbacks would be dependent on the resource of concern and would be made in coordination with the CCC. Within ESHAs themselves, there are development limitations. Developments within ESHA require a thorough analysis. In circumstances where impacts to ESHA are necessary for a project, conflicts within the coastal resource protection policies must be examined so the CCC can select a course of action that is most protective of coastal resources. In addition to avoiding and minimizing impacts to the extent feasible, mitigation measures are needed to offset impacts to ESHAs.

Potential ESHAs were identified for the Albion River Bridge Project. There is no feasible alternative to avoid impacts to all ESHAs. During the permitting phase of the project, a detailed ESHA Analysis will be prepared and submitted to the CCC. All feasible measures would be implemented to compensate for project impacts to ESHAs, including onsite revegetation in temporarily impacted areas and mitigation measures **AMM-BR-1**, **AMM-BR-8**, and **AMM-BR-9**. Overall, the project would be compliant with the CCA.

Project Details

The comment letter contends that the environmental document is inadequate as there is not enough detail on design elements, such as ramps and other structural elements. All areas that could potentially be impacted by all feasible build alternatives were assessed based on preliminary designs. Further detail in the design becomes available after a preferred alternative is chosen and the design phase progresses.

Maps of impacts to sensitive resources are included in Appendix J, *Sensitive Habitat Impact Maps,* Appendix K, *Aquatic Resource Impact Maps*, and in Figures 80 through 91 for rare plants. Impacts to biological resources are also described under the relevant resource subsections of Section 3.4, *Biological Environment.*

The commentor also states that the term “as necessary” as it relates to vegetation removal has no verifiable criteria. As above, all areas that could potentially be impacted by activities such as vegetation removal were assessed. Impacts may be less than anticipated; as stated in the document, vegetation removal would be limited to the area needed to facilitate construction work.

Plants and Natural Communities

The letter has various comments on sensitive natural resources in the project area. As discussed above, botanical surveys were completed in compliance with CDFW protocols, and natural communities were identified based on the classification and keys in a Manual of California Vegetation, second edition and online updates.

For natural communities specifically, communities are mapped as a basic physical unit of vegetation. While some special herbaceous communities may be small, communities should have compositional integrity, structural integrity, and repeating patterns across a landscape. The minimum width of polygons for natural communities is generally no less than 30 feet (10 meters), though special herbaceous communities such as vernal pools may be smaller. Mapping units depend on the needs and requirements determined by agencies regulating the species, and the needs for impact assessments based on the potential scope of work.

The following includes responses to specific comments on natural communities and plants in the project area. See the section on ESHAs above for comment references to ESHA.

- Sweet vernal grass/velvet grass semi-natural stands and Himalayan blackberry scrub behind the fire department (pages 21-22): As supported by the commenter’s observation of recent mowing, this area—including the grassy area and the area of regenerating blackberry—is regularly maintained. It is therefore described as ruderal vegetation. Ruderal vegetation includes grasslands and other areas that contain limited diversity of common native vegetation, and weedy species are prominent. This vegetation is common in or adjacent to developed areas such as roadsides which are regularly maintained by activities such as mowing, as in the case behind the fire department. The comment letter notes that if the area were not mowed, it would naturally be vegetated with coyote brush scrub. However, as this area is regularly maintained, mapping reflects existing conditions.
- Wetland vegetation behind the fire department (page 21): The wetland behind the fire department, in the location indicated by the commentor, is

mapped as Wetland E-3. Wetlands are discussed in Section 3.4.2, *Wetlands and Other Waters,* and depicted in Figure 78. As noted previously, additional technical detail is included in the NES.

- Coyote brush scrub behind the fire department (pages 21-22): Coyote brush scrub is mapped in the area indicated. Ruderal vegetation is also in this area adjacent to the road, as this area is regularly maintained as described above.
- Wetlands on the Ledford House parcel (page 25): It is acknowledged that the parcel with the Ledford House Restaurant contains wetlands, including a pond. Wetlands are depicted in Figure 78 and described in Section 3.4.2. Additional details on wetlands are included in the NES. No change is necessary.
- California coffeeberry-western azalea scrub-Brewer's willow shrubland adjacent to the Ledford House parcel (page 26): This area is mapped as coyote brush scrub, which includes coyote brush, coffeeberry, and/or coast silk tassel as the characteristic dominant or co-dominant species.[5] Other characteristic species of this association, such as poison oak and salal, were also present. According to the membership rules for this alliance, coffeeberry can have over approximately 30% to 50% of relative cover in the shrub layer with coyote brush. It occurs in areas such as coastal bluffs, terraces, and open exposed slopes. Based on the characteristic species for this area and the habitat, the coyote brush scrub is the appropriate community for this area. Further, the California coffeeberry-western azalea scrub-Brewer's willow shrubland is generally found in areas with moist or seasonally saturated sedimentary and serpentine soils, generally in habitats such as seeps, springs, and drainages[6]; the mapped coyote brush scrub is not in a wetland or similar area.
- Oatgrass on the Ledford House parcel (page 26): The comment letter notes that the northern part of the staging area parcel contains Idaho fescue–California oatgrass grassland alliance, and also contains sweet vernal grass. This matches the mapping in the environmental document, which includes mapping for red fescue grassland (an association under the above-mentioned alliance) as well as common velvet grass-sweet vernal grass in this area.
- Bracken fern in the Ledford House parcel (page 27): As noted in the previous comment, this area is mapped as common velvet grass-sweet vernal grass. Small patches of a specific species such as bracken fern does not necessitate a separate natural community. Bracken fern is a

[5] California Native Plant Society. (2024). A Manual of California Vegetation, Online Addition: *Baccharis pilularis Shrubland Alliance.* Retrieved from: https://vegetation.cnps.org/alliance/151.

[6] California Native Plant Society. (2024). A Manual of California Vegetation, Online Addition: *Frangula californica - Rhododendron occidentale - Salix breweri Shrubland Alliance.* Retrieved from: https://vegetation.cnps.org/alliance/547.

competitive plant that grows rhizomatously that is known to invade disturbed areas and cultivated fields. Because of its growing habit, it often forms dense stands.[7] The patches of bracken fern in the project area are small, below the size for sampling, and is not considered a separate community. Following CDFW protocols for vegetation mapping, it is included with the surrounding vegetation type. In addition, bracken fern is a species that is known to occur within the common velvet grass-sweet vernal grass meadow alliance.[8,9]

- Common velvet grass-sweet vernal grass and harlequin lotus on Gabrielle Levine's property (page 32): This area is mapped as common velvet grass-sweet vernal grass meadows; see Figure 77 in the environmental document. Harlequin lotus was also discussed in the environmental document; see Section 3.4.3, *Plant Species,* for a discussion of this species, and Figure 79 for a map of occurrences. A discussion on harlequin lotus as a host plant for lotis blue butterfly is discussed under the *Lotis Blue Butterfly and Behren's Silverspot Butterfly* subsections of Section 3.4.5, *Threatened and Endangered Species.* This species is common in the area and is only a potential host plant to lotis blue butterfly, which has not been observed in the area. For these reasons, Harlequin lotus is not considered an ESHA. See also the discussion on ESHA above.
- *Castilleja* species near Albion River North Side Road (page 35): While both rare *Castilleja* species, *C. mendocinoensis* or *C. litoralis* (also called *C. affinis* ssp. *litoralis*), have potential habitat in the project area (see Appendix L), neither of these species were observed during appropriately timed botanical surveys. However, both *Castilleja affinis* subsp. *affinis* (Indian paintbrush) and *C. wightii* (Wight's paintbrush) are present in the project BSA. There are no rare *Castilleja* species in the project area, and therefore, there would be no impacts associated with this species.
- Unusual plants near Albion River North Side Road (pages 35-36): The species listed are common and are well within the limits of their known

[7] Game, J.C., A.R. Smith, and T. Lemieux. (2012) Pteridium, in Jepson Flora Project (eds.) Jepson eFlora, https://ucjeps.berkeley.edu/eflora/eflora

[8] Keeler-Wolf, T., D. Schirokauer, J. Meinke, and P. van der Leeden. (2003). Classification of the Vegetation of Point Reyes National Seashore, Golden Gate National Recreation Area, Samuel P. Taylor, Mount Tamalpais, and Tomales State Parks, Marin, San Francisco, and San Mateo Counties, California. California Department of Fish and Game, Wildlife Habitat Data Analysis Branch, Sacramento, CA. Retrieved from https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161689&inline.

[9] Klein, A., T. Keeler-Wolf, and J. Evens. 2015. Classification of the Vegetation Alliances and Associations of Sonoma County, California. Report for The Sonoma County Agricultural Preservation and Open Space District and The Sonoma County Water Agency California Department of Fish and Wildlife Vegetation Classification and Mapping Program, Sacramento, CA. Retrieved from https://www.cnps.org/wp-content/uploads/2019/01/veg-klein-etal-2015-sonoma-vegetation-v2.pdf.

geographic range. They are not listed in local plans, policies, or ordinances. As such, further consideration is not required.

- Mendocino pygmy cypress (throughout pages 21-36): Caltrans biologists revisited the project site to review reported sites of Mendocino cypress. It was verified that pygmy cypress is present at various locations. The environmental document has been updated. See Section 3.4.3, *Plant Species,* and Section 4.3.4, *Biological Resources,* for a discussion of Mendocino cypress.

51. LCP Land Use Map 18, most recently amended in 1998, was reviewed.[10] Rare or endangered wildlife habitat is indicated with a triangle within a circle. The land use map does not indicate rare or endangered wildlife habitat within the project area. Regardless, habitats of rare and endangered animals on the land use maps are general locations, and species move. See the *Raptors* Subsection of Section 3.4.4, *Animal Species,* for information on osprey and other raptors, including baseline conditions, potential impacts, and standard measures proposed to avoid and minimize those potential impacts, specifically pre-construction surveys. While osprey have been observed foraging in the project area, including in site visits in 2023, none have been recorded nesting within the project area. The closest known osprey nest is upstream, approximately 0.4 mile east of the project ESL. There is no ESHA associated with osprey in the project area. See the discussion on ESHA in Response 50 above for more information. The project is not anticipated to impact nesting osprey, and therefore there are no associated cumulative impacts.

52. The project does not propose to dam the Albion River. See the project description in Chapter 2, *Project Description.* Both airborne and underwater noise was analyzed in the environmental document. See discussions on specific species, including marine mammals and listed fish in Section 3.4.4, *Animal Species,* and Section 3.4.5, *Threatened and Endangered Species.* These sections also discuss water quality during construction as it relates to these species. Additional information on water quality is included in Section 3.3.2, *Water Quality and Stormwater Runoff.* Avoidance, minimization, and/or mitigation measures are also described in these sections. The document is compliant with CEQA and NEPA, and consistent with the CCA.

53. As stated in Response 52, the project does not propose to dam the Albion River, and there would be no substantial alteration to the river. Cofferdams are commonly used on bridge projects to provide a hydraulic barrier between a bridge foundation and surface/ground water, which allows the work zone within the cofferdam to be dewatered. Cofferdams would be used to isolate the pier foundations for all Build Alternatives and would be used to create a dry work zone to facilitate removal of the existing bridge pier on the south side of the Albion River. The cofferdams are placed close around the piers being

[10] County of Mendocino. (1998). County of Mendocino Coastal Zone: Map 18, Albion. Retrieved from: https://www.mendocinocounty.gov/departments/planning-building-services/maps.

constructed or removed and would only be in place temporarily for these activities.

54. The project does not propose to withdraw up to 16,000 gallons/day from groundwater beneath Albion Flat. While some water may be supplied by on-site dewatering activities, other sources of water may include local fire hydrants, and/or water use agreements with a local water district, mutual water company, business(es), and/or residence(s). Caltrans has complied with all requirements of CEQA and NEPA. Further, the required studies and technical analyses were prepared; see ED Appendix H, *List of Technical Studies,* and the references to these studies throughout the document, including ED Section 3.3.1, *Hydrology and Floodplain,* Section 3.3.2, *Water Quality and Stormwater Runoff,* and Section 3.3.3, *Geology/Soils/Seismic/Topography*.

    Within the project area, during normal flow conditions, tidal actions control the hydrology at the project site. The proposed project could temporarily result in a localized drawdown of groundwater when conducting dewatering activities, but this work would only be performed during specific and temporary work activities and the groundwater baseflow and quality would return to pre-construction conditions once those activities are complete. The project would not have any long-term impacts to groundwater levels or have associated impacts on the river hyporheic zone or any connected subterranean flows. Similarly, no changes in biological productivity would occur in this zone.

    All listed species with the potential to be in the project area have been analyzed in compliance with requirements of CEQA and NEPA. Coho salmon and Northern California steelhead are discussed in Section 3.4.5, *Threatened and Endangered Species*. While in the river system, the juvenile life stages of these species feed primarily on zooplankton and insects, and while tardigrades may sometimes compose part of the zooplankton community, tardigrades are not documented to be a measurable component of the diets of juvenile salmon or steelhead trout. See Master Response 1 (Rehabilitation) for information related to impacts of the rehabilitation alternatives.

55. See Response 49 above. The referenced comments to the U.S. Army Corps of Engineers were not provided to Caltrans.

56. Baseline conditions are contained in the *Affected Environment* subsections of Section 3.4.

    A revegetation plan would be prepared and implemented for the project, which would include a plant pallet, establishment period, watering regimen, monitoring requirements, and measures to control invasive species (Standard Measure **BR-4 [B]**).

    Caltrans has committed itself to a variety of avoidance, minimization, and mitigation measures for this project. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments for this proposed project.

57. While the proposed project would temporarily result in GHG emissions during construction, it is anticipated that the project would not result in any increase in

operational GHG emissions. With implementation of construction GHG reduction measures, the emissions generated by the project would be less than significant. The proposed project does not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. In assessing cumulative impacts, it must be determined if a project's incremental effect is "cumulatively considerable". The wider structure would provide safe and reliable multimodal access across the Albion River. The Build Alternatives are not highway capacity increasing; therefore, the project would not induce vehicle travel nor lead to increased operational GHG emissions. VMT would not increase because of the proposed project.

Sea Level Rise Projections were based on the 2018 Caltrans and Ocean Protection Council (OPC) SLR Guidance Manual. The OPC is the basis for the California Coastal Commission's Sea Level Rise guidance document and, as such, is sufficient for transportation project level analysis. The guidance was updated in 2024, with modified projections and SLR ranges; in 2100, the Intermediate-High SLR scenario projection is 4.5 feet, and the High SLR scenario is 6.4 feet. The updates do not affect the analysis.

58. The Community Impact Assessment identified a community study area comprised of two census block groups, making up one census tract: Census Tract 110.01. The community study area characterizes the socioeconomic environment and is defined as the census tracts or census block groups located immediately adjacent to the environmental study limits. Census tracts in the vicinity of the project are very large because the setting is primarily rural with a low population density.

    The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct, not four to six.

    Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional details regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).

    A comprehensive environmental analysis for the proposed project was completed. The construction emission model used for the project-specific air quality analysis includes emission estimates from on-road and off-road sources during construction. The on-road source category includes emissions from trucks used to transport materials to the construction site. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including controls to protect air quality. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments, and Master Response 9 (Air Quality).

The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

59. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. See ED Section 3.2.11, *Cultural Resources,* for a discussion of cultural resources in the project area, as well as the phased approach to identification of resources in areas where no access was granted, which is allowable under Stipulation XII.A of the Section 106 Programmatic Agreement.

60. Many energy users contribute indirectly to the energy consumption of a transportation system, but these are difficult to reliably quantify at the individual project level. These energy users include those that refine raw materials into products such as vehicles or roads; explore for and refine oil into various fuels; construct and maintain dams, power plants, transmission lines, fuel distribution systems, train stations, and airports; and many others. Such factors are often studied in energy life cycle or carbon footprint analyses. These considerations are important to acknowledge; however, attempting to characterize or quantify these factors at the project level is generally speculative and of little use to decision makers. As such, these factors are outside the scope of the project-level transportation energy analysis.

    The environmental document determined that rehabilitation of the existing bridge would fail to meet most of the basic project objectives. After thorough analysis, and in light of the age and structural condition of the existing bridge, rehabilitation as a project alternative was eliminated from further review (see Appendix I).

61. Additional geotechnical investigations will be performed during the permitting phase of the project, and after the final environmental document is released. The bridge would be built to ensure that it is structurally sound and geologically stable. Analysis has been completed in the environmental document that all build alternatives, including the identified preferred alternative (Design Option 2B), neither creates nor contributes to erosion and geologic instability. See ED Sections 3.3.3, *Geology/Soils/Seismic/Topography,* and 4.3.*7, Geology and Soils*.

    The identified preferred alternative, Design Option 2B, requires less exposed permanent shoring (8,700 square feet) than the other design options, which reduces alteration to the natural landform consistent with the Coastal Act.

62. See Response 57 above.

    The environmental document determined that rehabilitation of the existing bridge would fail to meet most of the basic project objectives. After thorough analysis, and in light of the age and structural condition of the existing bridge, rehabilitation as a project alternative was eliminated from further review (see Appendix I). See

also Master Response 1 (Rehabilitation) for a discussion of impacts related to rehabilitation.

63. Design Option 2B is the environmentally superior (least environmentally damaging) Build Alternative as described in ED Section 2.3.1. For the Build Alternatives, Design Options 2A and 2B (identified as the preferred) have the least amount of shored excavation and bluff stabilization compared to Design Options 1A and 1B. The environmental document determined that rehabilitation of the existing bridge would fail to meet most of the basic project objectives. After thorough analysis, and considering the age and structural condition of the existing bridge, rehabilitation as a project alternative was eliminated from further review (see Appendix I).

64. Caltrans has standard specifications for preventing, controlling, and abating water pollution within waters of the state, as well as specifications for timing of removal and disposal of all debris resulting from demolition/construction activities.

65. Description and analysis of the construction phase and operational impacts can be found in the Environmental Consequences subsection of ED Section 3.3.2, *Water Quality and Stormwater Runoff*. The proposed project includes the re-establishment of roadside drainages and culverts, which would be located and sized to accommodate anticipated surface runoff. Table 52 in Section 3.4.2, *Wetlands and Other Waters*, identifies culverts, drainages, and other aquatic features within the project area, and Appendix K, *Aquatic Resource Impact Maps*, includes maps of their locations. Potential impacts to salmon and steelhead habitat are discussed in Section 3.4.5, *Threatened and Endangered Species*, of the ED.

66. The build alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.5-1 and all other policies stated in Table 9 of the environmental document. In addition, see Master Response 4 (Coastal Act Policies).

    Impacts under CEQA would be less than significant for Transportation and Recreation, and temporary impacts are limited to the construction phase (see ED Sections 3.2.5 and 3.2.9). For public safety, beach access via the foot path would be prohibited during the duration of construction, however the Albion River outlet would remain open, with intermittent closures for safety, and recreational opportunities upstream would continue. After construction, full access would be restored and impacts to natural resources would be mitigated; therefore, the project is consistent with PRC 30210.

67. The estimated 94 dBA Lmax level could occur at residences approximately 115 feet from impact pile driving for Design Option 2B. The referenced 101 dBA is at a standard reference distance of 50 feet; no residences are expected to be within 50 feet of the pile driving operation. Public access to the beach area under the Albion River bridge would be restricted during construction, which would prevent exposing the public to substantial construction noise during the use of the Albion

River Campground. The estimated noise levels included for pile driving do not account for potential reduction from the proposed acoustic shielding.

Construction noise is typically evaluated using the maximum root mean square pressure (Lmax) or an average hourly equivalent. The hourly equivalent noise level and Lmax were used to evaluate equipment noise for this project. The NSR was prepared consistent with the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (TENS). As sound propagates from the source geometric spreading, ground absorption, meteorologic conditions, and shielding have an effect on the received noise levels. The NSR considers the effects of geometric spreading to estimate construction noise levels. Evaluating metrological effects can be complex due to the variability in metrological conditions throughout the day. Metrological conditions can have a positive or negative effect on the received noise level. The TENS manual states that present policies and standards assume zero wind for noise analyses. The NSR is believed to present an overall worst-case assessment of potential noise impacts, even with consideration of atmospheric effects (wind, etc.). This is because the construction noise evaluation does not include considerations for ground absorption or shielding effects.

A vibration screening was conducted for the project. Predicted vibration levels were below the damage thresholds established in the Transportation and Construction Vibration Guidance Manual.

The ED determined that rehabilitation of the existing bridge would fail to meet most of the basic project objectives. After thorough analysis, and in light of the age of and structural condition of the existing bridge, rehabilitation as a project alternative was eliminated from further review (see Appendix I*).* See also Master Response 1 (Rehabilitation) regarding impacts related to rehabilitation.

68. The ED includes an assessment of the community and community impacts that follow requirements and guidance set forth by CEQA and NEPA. The assessment considered factors such as population characteristics, age, housing, income, employment, commute patterns, and disadvantaged communities. See ED Section 3.2.6, *Community Character and Cohesion.* See also the Community Impact Assessment for additional detail.

    Impacts to recreation during construction are discussed in ED Section 3.2.5, *Parks and Recreational Facilities;* see also Master Response 5 (Public Access During Construction). The loss of campsites during the summer construction season could increase demand at other campgrounds. However, this impact would be temporary and is not anticipated to require the construction or expansion of additional recreational facilities given the other campgrounds available in the area. In regard to cost of recreational areas, state parks—of which there are multiple in the area (see referenced Section 3.2.5)—have fees similar to or lower fees than the Albion Campground; for example, overnight fees for campsites start at $45 for Russian Gulch State Park with lower fees for

hike/bike campsites[11], while Albion Campground starts at $58.[12] In addition, even with campsite closures, the boat launch east of the Albion Campground store would remain open during construction, and other campground facilities may remain open pending right of way negotiations. The Albion River outlet would remain open, with intermittent closures for safety, and recreational opportunities upstream would continue. The project would not have a significant effect on recreation under CEQA.

While the Build Alternatives would require relocation of the campground manager's residence, any eligible displaced occupant would be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970. The proposed project would not displace a substantial number of existing people, necessitating the construction of housing elsewhere. The project would not have a significant effect on population and housing under CEQA.

Design Option 2B was identified as the environmentally superior alternative in the Draft ED and has been identified as the preferred alternative in the FED. See Master Response 1 (Rehabilitation) in relation to comments about impacts associated with rehabilitation of the existing bridge.

69. For public safety, the proposed project would temporarily limit and/or restrict public access to the Albion Flat Beach, Albion Campground, and Albion River outlet during construction. Pending right of way negotiations, some campground facilities may remain open to visitors. The Albion River outlet would also remain open during construction, except when intermittent closures are necessary to facilitate bridge construction or demolition activities. The project would coordinate outlet closures in advance with the U.S. Coast Guard Captain of the Port. See Master Response 5 (Public Access During Construction) for additional information. Anticipated numbers of Albion River outlet closures were discussed in ED Section 3.2.5. The project would have a less than significant impact on recreation under CEQA; see ED Section 4.3.16, *Recreation*, for additional information.

    Schooner's Landing would not be affected by the project, though this location is currently closed. The Ledford House and Mendocino Coast Lodge would remain accessible; the project contractor would be required to maintain access to driveways, houses, and buildings within work zones (see Standard Measure **TT-2**).

    The project is consistent with public resources codes associated with public access and recreation; See ED Section 3.2.3, *Coastal Zone,* for more information.

70. Impacts to traffic and transportation were assessed for the project; see ED Section 3.2.9, *Traffic and Transportation/Pedestrian and Bicycle Facilities,*

[11] California State Parks. (2024). Reserve California. Retrieved from https://www.reservecalifornia.com/Web/Default.aspx.
[12] Albion Campground and Marina. (2024). RV & Tent Camping. Retrieved from https://albionrivercampground.com/rv-and-tent-camping/.

including for information related to anticipated traffic control. As noted, a Transportation Management Plan will be prepared for the project in accordance with Caltrans' Transportation Management Guidelines. The proposed project is anticipated to last 3 to 5 years—3 years for the identified preferred alternative, Design Option 2B—and the traffic control for the project is standard and similar to traffic control associated with other Caltrans projects. See Master Response 7 (Traffic and Emergency Response) for more information related to traffic during construction. The project would not have a significant impact on transportation under CEQA; see ED Section 4.3.17, *Transportation,* for additional information. In addition, the purpose of the project is to provide a bridge that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizing ongoing maintenance costs. This purpose, and the need, are described in ED Section 1.4, *Purpose and Need.* The purpose and need of the project are not associated with future increased travel demand, and the project is not capacity-increasing.

71. Due to restricted access in the project area, the NHPA Section 106 process would be conducted through the development and execution of a project-specific phased Programmatic Agreement (Phased PA), which is allowable under Stipulation XII.A of the Section 106 PA (executed 2024). Stipulation XII.A of the Section 106 PA is consistent with 36 CFR Sections 800.4(b)(2) and 800.5(a)(3), which allows for the phasing of identification, evaluation, and application of the Criteria of Adverse Effect for undertakings in which locations within the APE have restricted access that preclude completion of identification efforts, evaluation of a potential historic property, or effects determinations. See ED Section 3.2.11, *Cultural Resources,* for additional information. See also the discussion of effects to resources under CEQA in ED Section 4.3.5, *Cultural Resources.*

    Regarding bluff stabilization, one of the criteria used to identify the preferred alternative was the landform change associated with bridge construction and stability of the northwest bluff. The identified preferred alternative (Design Option 2B – East Arch) has less landform change than the other arch option (Design Option 1B) and does not propose construction on the northwest bluff.

72. Stormwater management is discussed in ED Section 3.3.2, *Water Quality and Stormwater Runoff.* A Storm Water Pollution Prevention Plan (SWPPP) would be prepared to comply with applicable conditions of the Construction General Permit (Standard Measure **WQ-1**), and the construction contractor would incorporate pollution prevention and design measures consistent with the SWPPP (Standard Measure **WQ-2**).

    With respect to water use during construction, water would likely be supplied from a variety of sources; in addition to water from on-site dewatering activities, water supplies may be obtained from local fire hydrants, and/or water use agreements with a local water district, mutual water company, business(es), and/or residence(s). No onsite well is proposed. Water use would cease following construction. Impacts on utilities and service systems have been examined under CEQA; see ED Section 4.3.19, *Utilities and Service Systems.* The project would have a less than significant impact on water supplies. In addition, impacts to the

biological environment have been assessed; it has been determined that the project would have, under CEQA, a less than significant impact with mitigation incorporated on biological resources; see ED Section 4.3.4, *Biological Resources,* for more information on these impacts, and the avoidance, minimization, and/or mitigation measures proposed.

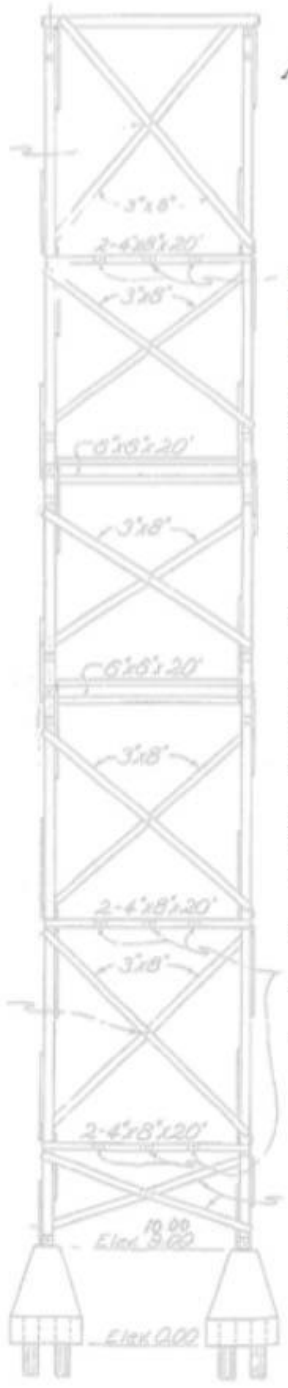
The environmentally superior alternative and identified preferred alternative is Design Option 2B. See Master Response 1 (Rehabilitation) for information on impacts related to the rehabilitation options.

73. Caltrans is coordinating with the Albion-Little River Fire Protection District (ALRFPD) regarding the proposed project to ensure use and acquisition of their property would not interfere with emergency services, or planned use of the property. In addition, access to the fire station would be maintained at all times during construction (**AMM-UE-1)**.

    Emergency response agencies would be notified of the proposed project construction period and would have access to SR 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles across the bridge at all times, including provisions for access during evacuations (such as for wildfires) (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes and would have a less than significant effect under CEQA. See Master Response 7 (Traffic and Emergency Response) for more information on emergency services and traffic control during construction.

74. See responses provided above regarding comments concerning the environmental document. The environmentally superior alternative, Design Option 2B, has been identified as the preferred alternative. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation). No new environmental document is warranted.

4.2 ALBION BRIDGE STEWARDS 2



Albion Bridge Stewards
A working group of the Albion Community Advisory Board
P.O. Box 363
Albion, CA 95410

By Electronic Mail
albionbridge@dot.ca.gov

October 9, 2024

Caltrans
Attn: Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

RE: "ALBION RIVER BRIDGE PROJECT" DEIR/S -
SUPPLEMENTAL COMMENTS, PART 1

Dear Ms. Walker,

This letter contains our supplemental comments on Caltrans' "Albion River Bridge project" DEIR/S appendices and belated project revisions and explanations that Caltrans first presented to the public in a Power Point Presentation during the virtual "informational meeting" on the evening of September 26, 2024.

Respectfully submitted for the Albion Bridge Stewards (by authorized electronic signatures):

Tom Wodetzki	***Warren DeSmidt***	***Arlene Reiss***
David Steinrueck	***Kelly Steinrueck***	***Ali van Zee***
Annemarie Weibel	***Bill Heil***	***Alison Gardner***
John Johansen	***Janet Eklund***	***Jim Heid***

Website: http://albioncab.wordpress.com
Email: acab@mcn.org

1. Appendix A –

Section 4(f). It is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites. (49 U.S.C. 303, Section 4(f).)

In enacting the California Coastal Act (Division 20, Public Resources Code - incorporated by the United States in the approved California Coastal Management Program (CCMP) that pursuant to the United States Coastal Zone Management Act (16 U.S.C. § 1451 et seq.) controls US Federal Highway Administration actions and activities that affect coastal resources - the legislature found and declared that a basic goal of the state for the coastal zone is to protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources. (PRC § 30001.5(a).) To that end, the legislature also found and declared that the California coastal zone:

- a distinct and valuable natural resource of vital and enduring interest to all the people and exists as a delicately balanced ecosystem;
- the permanent protection of the state's natural and scenic resources is a paramount concern to present and future residents of the state and nation;
- to promote the public safety, health, and welfare, and to protect public and private property, wildlife, marine fisheries, and other ocean resources, and the natural environment, it is necessary to protect the ecological balance of the coastal zone and prevent its deterioration and destruction; and,
- existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone. (PRC § 30001(a)-(d).)

Consistent therewith and in furtherance thereof, both California and the United States provided the following mandatory conservation and development standard for development in the coastal zone, as here, following January 1, 1977: "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting." (PRC § 30251.)

The iconic Albion River Bridge is located on the scenic California Coast Highway in a designated and mapped "highly scenic area" in rural coastal Mendocino County and within the California coastal zone. The CCMP incorporates PRC § 30251 and its

County Local Coastal Program (LCP) implementation, including the delineations and specifications of LCP land use map 18 (Albion), as controlling law.

The Albion River Bridge was constructed - primarily of treated Oregon Douglas Fir timber - across lower Albion River Valley through creative, coordinated, well-designed, carefully sourced, and efficiently performed work during the materiel shortages of World War II, and now constitutes a Federal- and State-listed historic place.

1

The Bridge is not exempt from Section 4(f) review and Caltrans' proposed destruction (and misidentified "replacement") of it will substantially adversely affect its historic qualities, which cannot be avoided, minimized, or otherwise mitigated by mere illustration (or retention of a concrete capped tower foundation in or adjacent to Albion River and abandonment-in-place of other sawn-off Bridge foundation elements), as the DEIR/S proposes. In this context, we object to Caltrans' continued abject failure to respond to our reasonable request, made on August 22, 2024, for the Albion Bridge Stewards to be recognized as a formal participant in the Section 4(f) consultative process.

2

More than 1.5 million persons - including, but not limited to members and supporters of the Albion Bridge Stewards - on average cross the straight (linear, not curved, as the DEIR/S falsely indicates) Bridge in a year, flanked by its iconic white posts and railings that afford majestic views to and along the coast, the Albion River, lower Albion River Valley, and scenic South Albion Village. Renowned graphic artists and countless others from California, the United States, and other countries photograph, draw, and paint the Bridge in its designated and mapped highly scenic setting, appreciate the traditional beauty of its now unique design and construction in coastal California, and receive inspiration from its standing testament to the nation's Greatest Generation that built the Bridge.

To the west of the Bridge are the Albion Cove Beach public and in part semi-privatized recreational area, the lower 500 feet of estuarine wild-and-scenic (recreational) Albion River, semi-sheltered Albion Cove (Albion Bay), the California Coastal National Monument, the dramatic North and South Albion Heads, and beyond them, the planet's Great (Pacific) Ocean. The River and Cove provide vital migratory habitat for listed Coho salmon and Steelhead; the lower Valley, Cove, and Monument support other sensitive species, including Ospreys and Golden Eagles. To the east of the Bridge are the Albion River Campground and (riverside) Marina, and Schooners Landing, traditional lower cost coastal commercial recreational facilities of which only a reduced number continue to exist in the County, and existing South Albion Village residential, educational, and commercial (recreation supportive) uses. Along the north and south ends of the Bridge are the designated and mapped highly scenic areas of the Albion River Bluffs, which also support sensitive floral species and before Caltrans destroyed it, the LCP-mapped Osprey nesting site on the wooded northwest side of the Bridge that overlooks Albion Cove.

The ARB project proposes to (a) effectively preclude public access to and recreational use of the Beach, Campground, vertical public access ways, lower River, Cove, and adjacent eastern Pacific Ocean variously during the 4 to 6 year project construction/ destruction period, (b) place fill in the Albion River, (c) discharge toxic materials to it in the absence of a site-specific pollution prevention plan and analysis of its adequacy, (d) extract construction process water from the Albion River hyporheic zone below Albion Flat, without analysis of it, (e) excavate the designated highly scenic, environmentally sensitive Albion River Bluffs, (f) excavate and place fill on the Albion Flat Dune beneath and westerly of the Bridge, and otherwise grade Albion Flat, (g) shade the Dune, Albion River, Albion Cove Beach, and inner Albion Cove tidelands by the proposed "West Alternative 1" bridge location, (h) construct physical obstructions and create substantial noise barriers in Albion River that would block or impede migration and estuarine pre-migration staging by the sensitive fish species, and generate uncontrolled turbidity in the River, and (i) substantially impede visitor recreational access along Highway 1 through repeated "temporarily", but cumulative significant, lane or full road closures of the Bridge and approaches, without a site- and time-specific Transportation Management Plan and analysis thereof, over a 4-6 year period, with significant direct and cumulative adverse effects on access to public and commercial recreational destinations in Albion and upcoast to Mendocino (Town) and beyond.

3

The feasible, legally consistent, environmentally superior alternative to these substantial, unmitigated adverse effects of the Caltrans' "ARB project" on coastal recreational facilities and sensitive species consists of historic Bridge-congruent maintenance, repair, completed seismic retrofitting, and addition of a cantilevered pedestrian/bicycle way with connecting upcoast (lateral) and intersecting (vertical) improved paths in Albion.

4

We therefore respectfully request Caltrans to (a) continue the public review and comment period on the DEIR/S open until the requested Section 4(f) consultation has been concluded and opportunity for legal review of it has occurred, and (b) prepare a new or supplemental DEIR/S that fully and accurately analyzes the proposed "ARB project", the environmentally preferred and only legally available alternative, and (c) that reflects the requested historic resource consultation, before Caltrans takes any further action on this project.

5

2. Appendix D – Avoidance, Minimization, and/or Mitigation Summary. This Appendix reveals that Caltrans has no site-specific, mapped and textually described and analyzed, or legally available site(s) extrinsic sites for mitigation through avoidance or off-site related, proportionate compensation of the direct and cumulative (significant) adverse effects of the "ARB project", including, but not limited to, its proposed "West Alignment 1" alternative, that we have identified in our comments on the DEIR/S of September 9, 2024. Instead, Appendix D tellingly omits (or omits reference to) a complete and accurate project area baseline conditions study and consists of speculative, ambiguous, generic, frequently unquantified, and unenforceable hodgepodge that does not constitute the required mitigation protocol for each identified (significant) project impact on sensitive environmental resources. Centrally, the

proposed project (bridge and approaches, both during construction and operation) is located in the designated and mapped "highly scenic area", where its width, length, height, and out-of-character concrete structures are plainly not subordinate to the character of the setting in lower Albion River Valley and adjacent uplands. The DEIR/S thus proposes a project (development) that lacks requisite mitigation and on that basis fails.

6

3. Appendix F – Public Outreach and Scoping: Notice of Preparation, Notice of Intent, Public Comments. This Appendix documents that Caltrans (a) has created a paper (check-the-box) trail (albeit with blank pages in the electronic version posted to the project web site) of notices regarding various aspects of the project, (b) omits disclosure of its - apparently substantially incomplete - noticing list(s), (c) received numerous comments in opposition to the project prior to DEIR/S publication, (d) has not included all of them in this Appendix, (e) has not ascertainably or by specific references responded to many pre-DEIR/S comments from the public, (e) has not disclosed to the DEIR/S record, as of the publication date, all Caltrans or project consultant writings with all entities with which Caltrans has contractual payment-for-services rendered "Interagency Agreements", and (f) has not produced them, and thereby has denied relevant environmental information that Caltrans used in preparation of the DEIR/S. In addition, (g) we strongly object to Caltrans' repeated failure - after repeated requests - to hold any public hearings on the DEIR/S, and to exclude public testimony at Caltrans' intentionally unorganized "meetings" (e..g., by failure to identify speakers by name, artificially limiting time for testimony, and having informed Caltrans or consultant representatives present to answer the public's questions) on the DEIR/S from the comments that the Final EIR/S will address.

7

4. Appendix I – Consideration of Rehabilitation Alternative. Appendix I is both inaccurate and incomplete. First, preservation of the iconic Albion River Bridge is significant not only to the Albion community, but even correspondence produced in the DEIR/S indicates, to people from other places in California, other states, and other countries. Second, the list of "rehabilitation" components (a) is unsupported by specific component/location identification, (b) relies on speculative projections of component conditions, (c) omits reference to specific prior Bridge inspection recommendations and variously exceeds them or conflates them with recommendations for work that the inspections do not base on specifically identified need for maintenance or repair or replacement of subject components, (d) omits presentation of the Bridge structural and paint system maintenance records, (e) omits presentation and analysis of Caltrans' demonstrated ability to repair and quickly reopen the Bridge to vehicle traffic after the car-log truck collision that resulted in shearing of X-timber components on the east side of the timber tower at Bents 9-10 in 2002, (f) omits explanation of other repair and maintenance not being timely, or incompletely, or marginally (sub-standardly) performed, including Caltrans' knowing, intentional, and unlawful failures to properly maintain, repair, or replace deteriorated Bridge components (including, but not limited to below and adjacent to Bridge scuppers, road deck potholes, and fractures by which water has variously been discharged, exfiltrated, and infiltrated to impact timbers below or downwind from them), and (g) any professional current cost and feasibility

5 of 6

assessment for sustainable, non-destructive, and minimized Bridge operations impacts repair, maintenance, and enhancement work in comparison to the $125 million to $165 million projected cost for the proposed bridge. The Caltrans bridge engineer who spoke at length during the "informational meeting" on September 26, 2024 is not a recognized timber bridge (or structure) engineer, and his comments therefore lacked requisite foundation. Appendix I consists of a self-serving Caltrans statement that does not qualify as an accurate, complete, internally consistent, and valid assessment of the Bridge preservation alternative, which renders the DEIR/S also in this regard as substantially deficient.

Tellingly, Caltrans in 2018-2019 declined to benefit from the offered expert assessment of the Albion River Bridge by national timber bridge/structure experts Dr. Ben Brungraber and Dr. Dick Schmidt, both also licensed engineers.

Response to Albion Bridge Stewards 2

1. Evaluation of the bridge under Section 4(f) was included as Appendix A of the environmental document. Under Section 4(f), Caltrans coordinates with the official with jurisdiction of the resource. The Albion Bridge Stewards are not an official with jurisdiction over the Section 4(f) property. Coordination conducted for the Albion River Bridge was summarized in Appendix A.

   The request made by the Albion Bridge Stewards on August 22, 2024, was in regard to participating as a consulting party under Section 106 of the National Historic Preservation Act (NHPA). Caltrans has acknowledged the Albion Bridge Stewards as a consulting party under Section 106 and have included the Albion Bridge Stewards in consultation pursuant to Section 106. See also ED Chapter 5, *Comments and Coordination.*

2. Design Option 2B (East Arch) is the identified preferred alternative and is anticipated to take 3 years to construct, rather than 4 to 6 years. See Master Response 2 (Construction Duration). While the project may temporarily limit and/or restrict public access during construction for safety purposes, pending right of way negotiations, certain facilities at the Albion Campground could remain open to visitors. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. Recreational opportunities upstream of the proposed project would continue. See Master Response 5 (Public Access During Construction) for more information.

   A comprehensive environmental analysis for the proposed project was completed, including assessment of hazardous waste, water quality, visual, biological resources, parks and recreation, traffic and transportation, and cumulative impacts, among others. See ED Chapter 3, *Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures*, for details on specific resource topics. The ED identifies potentially significant impacts to aesthetics, biological resources, and cultural resources under CEQA. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level, while impacts to aesthetics and cultural resources would remain significant and unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls. See also Master Response 7 (Traffic and Emergency Response) for more information related to traffic during construction. In regard to information on osprey in the LCP, see Response 51 in Section 4.1 of this document.

3. The environmentally superior alternative is identified in the ED as Design Option 2B (East Arch). See ED Section 2.3.1, *Environmentally Superior Alternative*. This option has been identified as the preferred alternative.

   Rehabilitation of the existing bridge was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I,

Consideration of Rehabilitation Alternative. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation). The addition of a cantilevered walkway to the existing bridge to provide pedestrian access was not an option that was considered as there is no approved barrier that could connect to the existing bridge's timber deck to protect pedestrians from traffic. However, one of the rehabilitation options considered included wider shoulders.

4. See Response 1 above. The Section 4(f) document underwent legal review and was included in the Draft EIR/EIS that circulated for public review. The Albion Bridge Stewards have been included as a consulting party under Section 106 of the NHPA. A final EIR/EIS has been prepared pursuant to CEQA and NEPA.
5. The environmental document discussed baseline conditions in the *Affected Environment* subsections of Chapter 3. Significance of impacts to resources under CEQA are discussed in Chapter 4. A list of the avoidance, minimization, and/or mitigation measures, as well as additional information on biological mitigation for the project, is provided in Appendix D, *Avoidance, Minimization, and/or Mitigation Summary.* Caltrans has committed to mitigation for this project, identified types of potential actions to mitigate significant impacts, and identified mitigation objectives as required by CEQA.
6. See ED Chapter 7, *Distribution List,* for a list of entities that received notification of the availability of the environmental document. See Section 5.5, *General Public,* for additional information on noticing of the environmental document. Technical studies relied on for the project, other than cultural documentation with confidential information, were provided for public review. Requests for additional information from the Albion Bridge Stewards have been responded to. Caltrans held two public meetings during circulation of the Draft EIR/EIS; an in-person meeting held on August 14, 2024, on the draft document and a virtual meeting on September 26, 2024. The recordings of the public meetings are available on the project website. All written comments are responded to in the final environmental document.
7. The findings in Appendix I are based on the Caltrans bridge inspection reports, which are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

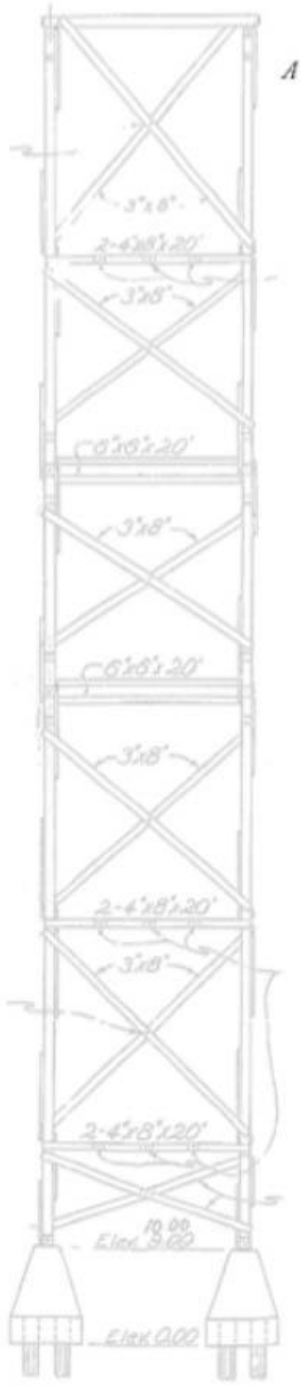
   As stated in Appendix I, FHWA summarized the need for bridge replacement in its 2021 Bridge Inspection Program Annual Review as it "is evident that Caltrans has been prudent at keeping this bridge in service beyond its expected years. It will require more resources to inspect, repair, and eventually reduce the level of serving the transportation needs of SR 1. All the reasons for the replacement of this bridge is at hand and the need to quickly replace this high-risk structure on this important coastal route is prudent".

   Rehabilitation of the existing bridge would not address many of the critical public safety issues associated with the bridge, would not address ongoing preservative leaching to the environment or vulnerability to sea level rise, would involve

ongoing and increasing costs associated with extensive inspections, maintenance, and repairs.

Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

4.3 ALBION BRIDGE STEWARDS 3



Albion Bridge Stewards
A working group of the Albion Community Advisory Board
P.O. Box 363
Albion, CA 95410

By Electronic Mail
albionbridge@dot.ca.gov

October 9, 2024

Caltrans
Attn: Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

RE: "ALBION RIVER BRIDGE PROJECT" DEIR/S -
SUPPLEMENTAL COMMENTS, PART 2

Dear Ms. Walker,

This letter contains our supplemental comments, part 2, on Caltrans' "Albion River Bridge project" DEIR/S technical studies.

Respectfully submitted for the Albion Bridge Stewards (by authorized electronic signatures):

Tom Wodetzki	***Warren DeSmidt***	***Arlene Reiss***
David Steinrueck	***Kelly Steinrueck***	***Ali van Zee***
Annemarie Weibel	***Bill Heil***	***Alison Gardner***
John Johansen	***Janet Eklund***	***Jim Heid***

Website: http://albioncab.wordpress.com
Email: acab@mcn.org

1. Community Impact Assessment.

1

1.1. This technical study contains no finite "Albion River Bridge project" description, but merely and erroneously, incompletely, and misleadingly characterizes the project as: "Caltrans proposes to replace the existing bridge (Caltrans Bridge #10-0136) on SR 1 in Mendocino County", which renders the Community Impact Assessment (CIA) incomplete from the start and inadequate.

2

1.2. The technical study represents that "the project is included in the 2023 State Highway Operation and Protection Program". However, the California Transportation Commission indicates that no 2023 SHOPP exists, which renders the CIA inaccurate.

3

1.3. The technical study states that "the project "is estimated to cost between $66 million and $93 million", inconsistent with (a) the 2022 SHOPP listing ("programming") that identifies a $97,357,000 project cost, with the caveat that $65,673,00 of that number consists of construction capital costs that will be reassessed when more design details are known". The "Albion River Bridge project DEIR/DEIS (June, 2024), electronic page (eP) 51/664 states that "(t)he proposed project is estimated to cost between $126 million and $155 million, which renders the CIA inaccurate and the DEIR/S internally inconsistent.

4

1.4. The technical study states that "Build alternatives have been developed to meet the purpose and need of the project, with consideration given to use of the similar or same alignment as the existing bridge, avoidance or minimization of impacts to the human and natural environment, and construction and maintenance cost. The alternatives currently under consideration include three build alternatives with various design options and a No-Build (No-Action) Alternative. A preferred alternative would be identified following agency, public, and stakeholder input during the environmental review process." First, the DEIR/S, its Appendices, and Technical Studies contain no accurate or clearly legible site plan, project sections, and project elevations that depict the (E) Bridge and the five Build Alternatives, including approaches and construction/deconstruction elements (development components). Second, the DEIR/S, Appendices, and Technical Studies contain no comparative textual or graphic analysis of the (E) Bridge and the Caltrans "Build Alternatives" that support the contention that the project would avoid or minimize project impacts, construction costs, or maintenance costs.
Third, Caltrans has declined, in response to a Public Records Act request, to produce its 15% concept ("Design Study") set of project plans, sections, and elevations, which denies relevant project and environmental context information for public analysis of the project. Fourth, the CIA is inconsistent with the DEIR/S, which identifies the "West Alignment 1" as the proposed project location.

5

1.5. The description in Section 1.4.3 of the replacement bridge lane, shoulder, railings, and walk way is merely generic, and omits identification and analysis of their (e.g.) (1) elevations at the south and north abutments, southerly and northerly bridge road deck slopes, and bridge crest, (2) relocated south and north approaches of Highway 1 between PM 43.4 and 44.2, (3) existing Highway 1 lane and shoulder asymmetrical widths/geometry in Albion between the Navarro Grade and Dark Gulch, and (4) the absence of continuing pedestrian walkway(s)/ California Coastal Trail segment both along Highway 1 in Albion and perpendicular walkway crossings at (north to south) North Albion Village, South Albion Village, and the six T-road intersections with Highway 1 in Albion.

6

1.6. The partial description of "construction elements" in Section 2.6 fails to provide a clear and full description of the project:

- By its own terms, the listing of project construction elements is incomplete and vague (conditional, without disclosed criteria for inclusion/exclusion in a formal project description, which the DEIR/S does not contain).
- The DEIR/S project plans do not identify the location, size, and species of proposed major vegetation (PRC § 30106, CZO 20.308.080(C)) removal, including, but not limited to trees and other status vegetation, and the performance criteria applicable thereto.
- The DEIR/S does not identify the proposed location of the Albion Flat dewatering and construction process water well (or offsite water for import) locations, including, but not limited to, in relation to the Albion River hyporheic zone below Albion Flat.
- The DEIR/S project plans do not identify the location of the work zone for the whole Albion River Bridge Project.
- The DEIR/S project plans do not identify the location of all grading (cut and/or fill) areas (envelopes) that the ARB project requires or implicates.
- The DEIR/S project plans do not identify the locations and dimensions of all temporary shoring, including, but not limited to, coffer dams, that the ARB project requires or implicates.
- The DEIR/S project plans do not identify the locations and dimensions of all retaining walls that the ARB project requires or implicates.
- The DEIR/S project plans do not identify the locations, dimension, and durations of all trestles that the ARB project requires or implicates.
- The DEIR/S project plans do not identify the locations, dimension, and durations of all trestles that the ARB project requires or implicates during (E) Bridge removal and (N) bridge construction.
- The DEIR/S project plans do not identify the locations, dimension, and durations of all ramps that the ARB project requires or implicates.
- The DEIR/S does not identify a specifically proposed construction of a (N) bridge, which renders the DEIR/S fundamentally incomplete and inadequate.
- The DEIR/S does not identify all components of the (E) Bridge proposed for removal and all components of the (E) Bridge proposed for abandonment on site.
- The DEIR/S does not identify all components in plan, section, and elevation view of all Highway 1 approaches to a proposed (N) Bridge between PM 43.4 and 44.2.
- The DEIR/S does not identify all project components in plan, section, and elevation view of Highway 1 T-intersections within the project area (Spring Grove Road, Albion Ridge Road, North Side Albion River Road, Albion-Little River Road.
- The DEIR/S does not identify all project components in plan, section, and elevation view of Highway 1 intersections with private driveways between PM 43.4 and 44.2.
- The DEIR/S does not identify all project components in plan, section, and elevation view of Highway 1 intersections with the seven (7) staging areas depicted on Figure 33.
- The DEIR/S does not identify all project components in plan, section, and elevation view of the construction haul roads depicted on Figure 33.
- The DEIR/S does not identify all project components in plan, section, and elevation view of Highway 1 drainage facilities that the project implicates.
- The DEIR/S does not identify all project components in plan, section, and elevation view of utility relocation that the project implicates.
- The DEIR/S does not identify all project components in plan, section, and elevation view of Highway 1 “improvements” that the project implicates.
- The DEIR/S does not identify all project components in plan, section, and elevation view of (N) bridge pier foundation or (N) bridge anchor elements that the project implicates.
- The DEIR/S does not identify all project components in plan, section, and elevation view of south- and north-facing Albion River bluff and of seaward-facing Albion Cove coastal bluff slopes that construction of the (N) bridge implicates through soil nail walls, steel sheet piles, and/or anchored soldier pile walls.
- The DEIR/S does not identify all project components in plan, section, and elevation view of all coffer dams that construction of the (N) bridge implicates in or in relation to the surface and subsurface flows of the Albion River.

3 of 7

7

1.7. Section 2.7, Alternative 1 (West Alignment"):

- Does not constitute a "replacement" bridge in that an out-of-context concrete and steel bridge in this "build alternative" location does not geospatially or functionally take the place of the (E), iconic, unique, relatively low vehicular speed, historic, and primarily timber Albion River Bridge, but instead supplants it with a typical Caltrans design, longer, high speed, community and lower Albion River Valley disharmonious, environmentally destructive, legally inconsistent, and therefore infeasible structure.
- The DEIR/S does not identify the location and geometry in legible plan view, or at all in section and elevation view, of the Alternative 1 "options" in either comparison to the (E) Bridge or the lower Albion River Valley and Albion Cove environment. Instead, the plan view of "build alternative 1" is fragmented, on muddied base aerial maps that also lack a scale bar and identification of their photo acquisition date(s), maps that falsely depict a non-existent curved (E) Albion River Bridge, maps that omit the relevant map explanations (legend) for symbols used on each sheet, and maps that lack clearly identified consecutive match lines across multiple sheets.
- The DEIR/S does not describe the lengths and heights or locations of soil nail walls, steel sheet piles, and/or anchored soldier pile walls would be used to shore excavations at the south and north embankments during construction.
- The "build alternative 1" staging outline is generic and jargon-heavy to the point of meaninglessness for the general public, and omits identification of the following key terms: (1) "bridge substructure", (2) bridge superstructure, (3) removal of the (E) Bridge.
- The plans (layout sheets) for Alternative 1 do not apparently (or clearly) distinguish between the option 1A and option 1B (N) bridge length polygons.
- The text descriptions of Alternative 1 neither specific the type and source of concrete (compression strength, batch plant location) or type and source of structural steel (raw, epoxy-coated, or stainless; domestic, Chinese, other) that this project plans to utilize.
- The plans do not indicate, and the DEIR/S contains no sections or elevations that depict, the locations of ramps, trestles, driven piles, and falsework that construction of this alignment requires.
- The DEIR/S does not identify the volume of excavation and fill of south- and north facing Albion River bluffs for the retaining walls, soil nail walls, anchored soldier pile walls for Alternative 1 development.
- The DEIR/S does not present and analyze an Alternative 1 construction schedule beyond the generalized approximately 3 year construction period, and altogether omits disclosure of the time required for destruction and removal of the (E) bridge.
- The DEIR/S, the Layout sheets in Appendix M, and on page 26 of this technical study does not describe the heights and lengths, or map the location, of the unspecified number of retaining walls at either the south or north approaches to the (N) bridge build alternatives.

8

1.8. Land Use Consistency. The proposed West Alignment 1 concrete bridge is higher, wider, and longer than the (E) historic Bridge, and consists of larger, visually blocking, concrete components than the (E) Bridge, which consists of consistently narrow vertical (or near vertical), horizontal, or diagonal timbers. None of the five Caltrans "Build Alternatives" is consistent with the controlling development subordination requirements in Coastal Act 30251, LCP Land Use Plan Policy 3.5-1 *et seq*., and the CCMP. The relevant test for consistency here is not whether "overall" land use patterns would remain, but rather specifically that the respective proposed locations of Alignments 1 and 2 are in whole, and in Alignment 3 in substantial part, in the designated and mapped highly scenic area where the supervening bridge development proposed by Caltrans is prohibited. Similarly, the DEIR/S presents no information or analyses that preservation of the (E) historic bridge is inconsistent with the controlling Coastal Act, LCP, or CCMP requirements; Caltrans' reference to LCP shoulder width recommendations as mandatory requirements is confused and spurious. Project adverse impacts to public

4 of 7

recreational access and uses at Albion Cove Beach, Albion River, Mendocino Coast Lodge, and other short-term lodging facilities will close them in whole or substantial parts during the 4-6 years of project construction/deconstruction and thereafter substantially degrade them through unsightly concrete retaining walls, large out-of-context concrete bridge foundation, pier, girder, and railing structures, and substantial shading of Albion Cove Beach.

9

1.9. Albion River. The construction of stream diversions in Albion River, dewatering of Albion River Flat and Albion River Bluffs, shown abandonment of the sawed-off, concrete-capped, north tower of the steel truss of the (E) Bridge in Albion River, and the daily appropriation of construction process water from the Albion River hyporheic zone below Albion Flat will directly and cumulatively significantly adversely impact the Albion River estuarine habitat and the sensitive Coho salmon and Steelhead for which it is protected habitat. Such development is inconsistent with PRC §§ 30230, 30231, and 30233.

10

1.9. Parks and Recreation. The DEIR/S acknowledges that public recreational access to and use of Albion River campground, lower Albion River, Albion Cove Beach, North Side Albion River Road, and Spring Grove Road will be variously blocked during project construction/ deconstruction, inconsistent with PRC §§ 30210, 30211, 30211, 30213, and 30220. However, the DEIR/S altogether omits description, mapping, and analysis of the impacts during the 4-6 year project construction/deconstruction period of the (unquantified) truck and worker traffic that the project will generate on Highway 1, Albion Ridge Road, and South Side Albion River Road in Albion, the impacts of project construction/deconstruction on the Albion commercial core, Ledford House, and other businesses that rely on customer access by these roads, and the impacts of project operations on the relocated West Alignment north approach Highway 1 travel lane to immediately adjacent to the east side of the Mendocino Coast Lodge restaurant. Further, the project proposes no lateral or vertical public access improvements along Highway 1 in Albion, on North Side Albion River Road, South Side Albion River Road, the California Coastal Trail along the Highway 1 corridor upcoast/downcoast from the proposed bridge, and active transportation (pedestrian, bicycle) crossings at the Albion-Little River Road, Albion Ridge Road, and Spring Grove Road intersections with Highway 1, inconsistent with the requirement of PRC §§30210 and 30212(a).

11

1.10. Farmland/Timberland. The DEIR/S acknowledges temporary impacts from construction to the range land parcel on South Albion Head adjacent to the west side of the proposed south approach to the proposed bridge, but omits analysis of project construction and operations impacts on the farms and soils adjacent to the southeast corner of the Highway 1-Albion Ridge Road intersection and to the east side of Highway 1 across from the Mendocino Coast Lodge, without the requisite agricultural land conversion analysis, inconsistent with PRC §§ 30241 and the long-term protection requirements for soils and timberlands (here, including hydric and upland soils and the baseline Eucalyptus stand on the northwesterly side of the (E) Albion River Bridge), inconsistent with PRC § 30243.

12

1.11. Growth. Without analysis of how widened, straightened, and traffic-accelerating travel lanes, as here and as a result of unexamined cumulative effects from adjacent Caltrans projects between Navarro Head and the downcoast end of the project, increase functional roadway capacity, the DEIR/S contends that the project would not change that capacity, and (again generically, but without area-specific analysis) would not stimulate planned or unplanned new development on the residentially undeveloped parcels along this nearly 4-mile long area of Albion, or in its inland subareas.

13

1.12. Community Character and Cohesion. Contrary to the self-serving analytical blindness of the DEIR/S, project construction/deconstruction, its associated seven staging areas, numerous haul roads, and regular intermittent and hinted, but not fully described repeated, full bridge closures during the 4-6 year project construction period will substantially and negatively alter the

character of both South and North Albion Villages, create thousands of lane or road closures that will bifurcate them, and similarly individually cumulatively impede local and visitor travel along Highway 1 in the coastal area between Navarro Grade and north of Mendocino (and beyond), to the foreseeable economic recession in the area. Operation of the proposed widened bridge and straightened and widened Highway 1, with foreseeable increases in vehicle speed and likely increases in traffic volume, will based on evidence from (e.g., the Highway 1-Big River Road intersection) decrease vehicular safety in the intersections of Albion-Little River Road, Albion Ridge Road, Spring Grove Road, Navarro Road, the Navarro Point Preserve driveway, and numerous other private, visitor-serving, and other commercial use driveways. Unlike maintenance, repair, and historic Bridge-congruent enhancements that continue to preserve its well-designed and well-built structure, Caltrans' "Albion River Bridge project" will not enhance public safety.

14

1.13. Cumulative Impacts. We continue to object to Caltrans' invalid piecemealing of environmental review of its back-to-back, in parts overlapping, Highway 1 widening, straightening, and acceleration projects through Albion along Navarro Ridge-Navarro Point. Preserve, Navarro Creek-Navarro Road, Salmon Creek Bridge and its approaches, and now Albion River Bridge and its approaches. Cumulative significant adverse effects from these projects include, but are not limited to, destruction of highly scenic areas (including the Albion Highway 1 gateway to this part of coastal Mendocino County) by excavation and fill grading for a widened highway road prism, filling of wetlands and diversion and channelization/filling of streams (water courses), removal of environmentally sensitive floral and faunal habitat, blockage and/or non-provision of lateral and vertical public accessways (including, but not limited to the California Trail), erection of superimposed structures that specifically are not subordinate to their setting, adverse effects on our health and safety, and direct and incremental destruction of our community character and visitor-dependent local coastal economy.

15

2. Noise Study Report. This technical study is substantially incomplete in that it does not (a) include all equipment (e.g., jackhammers that operate in concrete at 100-130 dBA, trucks ascending the South Side and North Side Albion River haul roads, dumping of bridge construction/deconstruction materials at the staging areas), (b) assess cumulative noise levels from simultaneous noise-generating equipment operations during each construction phase and planned (typ.) work day construction schedules, (c) model on site-specific wind velocity, direction, and ambient air pressure data the likely noise distribution by either construction phase or planned (typ.) work day, and (d) document ambient noise levels in typically quiet rural lower Albion River valley and adjacent upland areas (e.g., during the planned early morning through evening/night-time project work hours) in South Albion Village, at Ledford House, at the Mendocino Coast Lodge, on parcels between Albion Ridge Road and Albion River, on parcels east of Highway 1 and south of Albion Ridge Road, on North and South Albion Heads, on rocks and islets in Albion Cove used by sensitive avian species, and on parcels north and south of Navarro Ridge Road, and on those bases fails to provide the requisite data and analysis of the construction/deconstruction project on the human and other (aquatic, avian, terrestrial) species' environments.

In contrast to the disaggregated noise levels by construction equipment/phase in Table 8-1, we preliminarily have identified the following cumulative maximum and cumulative average noise generation from the Caltrans-identified sources. Each cumulative noise level equals or exceeds the maximum safe noise exposure limit. Actual noise levels when Caltrans' omitted noise generation sources and site conditions are included on the logarithmic scale will likely be substantially higher and thus even more intrusive and destructive, especially (but not only) during late afternoon through evening/night time and early morning hours.

In short: noise from the 4-6 year "ARB project" will substantially degrade the environment in lower Albion River Valley and adjacent terrestrial, aquatic, and avian environments, without any

identified (or identifiable) mitigations to avoid or substantially reduce those impacts. Basically, the construction noise will, depending on atmospheric conditions and daily work schedules, make South Albion, North Albion, the lower Albion River Valley, Albion Cove, lower Albion River, and adjacent areas uninhabitable by humans and other species, who are adapted to the low anthropogenic noise levels in the Albion environment, during the hours of each work day.

Partial Cumulative Logarithmic Noise Assessment (Typical, from Caltrans/FHWA Table)

Construction Phase	Cumulative Max	Cumulative Avg
Clearing and Grubbing	89	85
Earthwork	93	87
Paving	92	86
Bridge Construction	92	87
Pile Driving	101	94

Response to Albion Bridge Stewards 3

1. The project description for the Community Impact Assessment (CIA) is provided in Section 1.4.3, *Project Description.* The description contains sufficient information for analysis.
2. It is noted that the "2023" State Highway Operation and Protection Program (SHOPP) was incorrectly referenced; the project was contained in the 2022 SHOPP. This discrepancy does not affect the analysis presented in the CIA.
3. The CIA was completed prior to the Draft EIR/EIS, and costs provided in the document were based on the most accurate data at the time. The change in project cost does not affect the analysis presented in the CIA.
4. Descriptions and associated graphics for project features are contained in ED Chapter 2, *Project Alternatives.* Information provided is sufficient for analysis of the project. Additional graphics can be found throughout the document and appendices as relevant for impacts to environmental resources, and within relevant technical studies. The environmental document assessed project impacts and included avoidance, minimization, and/or mitigation measures. The identification of the preferred alternative, Design Option 2B (East Arch), took into consideration environmental impacts and construction costs, among other factors. See ED Section 2.4, *Identification of a Preferred Alternative,* for additional information.

   As noted in the document, under the No-Build Alternative, the proposed project would not occur, and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, seismic events, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance, and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Conversely, the Build Alternatives would minimize ongoing maintenance costs.

   Caltrans has responded to all Public Records Act requests.

   The Draft EIR/EIS did not identify "West Alignment 1" as the proposed project location. The document included three Build Alternatives—Alternative 1 (West Alignment; Design Options 1A and 1B]) Alternative 2 (East Alignment; Design Options 2A and 2B), and Alternative 3 (On-Alignment; Design Option 3A)—and a No-Build (No-Action) Alternative. Design Option 2B was identified as the environmentally superior alternative in the Draft EIR/EIS and has been identified as the preferred alternative in the Final EIR/EIS.
5. The information provided in the project description of the CIA contains sufficient information for analysis. Discussion of the California Coastal Trail is included in CIA Section 2.5*, Parks and Recreation.*
6. The reference to Section 2.6 appears to be made in error, as CIA Section 2.6 is in regard to Farmlands and Timberlands. No prime farmland, Williamson Act non-

prime farmland, or timberland would be affected by the project. Construction detail is not necessary for this section.

If intended as a reference to the Draft EIR/EIS, there is no Section 2.6. Details for construction of the proposed project alternatives are included in ED Section 2.2, *Project Alternatives.* The project description provides sufficient information to describe the project and allow for an analysis of impacts. Impacts of all project components have been assessed. In addition to ED Section 2.2, see relevant discussion of resources and impacts in Chapter 3, *Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.*

7. The reference to Section 2.7 appears to be made in error, as the CIA and Draft EIR/EIS do not contain a Section 2.7. See ED Section 2.2.5, *Common Design Features of the Build Alternatives*, and Section 2.2.6, *Unique Features of Build Alternatives*, for construction details pertaining to Build Alternative 1 (West Alignment), as well as the other Build Alternatives. These sections include sufficient information to describe the proposed project and allow for an analysis of impacts. Impacts of all project components have been assessed. In addition to ED Section 2.2, see relevant discussion of resources and impacts in Chapter 3*.*

8. The Build Alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.5-1 and other Policies stated in Table 9 in Section 3.2.2, *Consistency with State, Regional, and Local Plans and Programs*. In contrast, rehabilitation of the existing bridge would be inconsistent with many of the priorities set forth in the CCA, particularly Chapter 3 “Coastal Resources Planning and Management Policies”, and policies in the Mendocino County General Plan Coastal Element. Among others, rehabilitation of the existing bridge would not provide for safe multimodal access across the bridge (CCA Section 30210, Coastal Element Section 3.6-19), would not address the bridge’s vulnerability to sea level rise or tsunamis (CCA Section 30235, 30236, and 30253, Coastal Element Section 3.4), would not prevent ongoing leaching of chemical preservatives from the timber members (CCA Sections 30230, 30231, 30232, 30270, and 30001.5), and would not correct the hazardous turn condition north of the bridge (Coastal Element Section 4.9).

   Under all Build Alternatives, State Route 1 would remain a scenic two-lane road. Further, all Build Alternatives would provide greater continuity of views of the ocean from Albion by removing the lattice towers.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B was found to be the environmentally superior alternative and involves a spandrel arch that will allow for expansive views beyond the bridge. The spandrel arch creates a focal point other than the bridge deck, produces a distinctive look, and provides a gateway between the campground and the beach. The addition of a pedestrian facility on the new bridge would also enhance viewer opportunities.

   The proposed project would not permanently block public access to the Albion Campground and, pending right of way negotiations, certain Albion Campground

facilities may remain open to visitors using the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives* or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction).

9. Impacts to species such as coho salmon and steelhead were analyzed in the environmental document, including from activities such as dewatering. See relevant subsections of ED Section 3.4, *Biological Resources,* for additional information on coho salmon and steelhead, sensitive habitats, and other relevant resources, and 4.3.4, *Biological Resources,* for discussion of impacts to species under CEQA and relevant avoidance, minimization, and/or mitigation measures. See also ED Section 3.2.3, *Coastal Zone,* for a discussion on consistency with the California Coastal Act policies.
10. The project is consistent with policies related to public access and recreation. See ED Section 3.2.3, *Coastal Zone,* for a discussion of consistency with these policies. See also Master Responses 4 (New Public Access) and 5 (Public Access During Construction) for more information related to public access. The project would include widened shoulders and a separated pedestrian path, improving multimodal access across the Albion River. The project also proposes to improve Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and realigning the road. These changes would improve public safety and accessibility to the Albion Campground.

    In regard to traffic control during construction and impacts to the local economy, see Master Responses 7 (Traffic and Emergency Response) and 6 (Local Economy). Traffic control for the project is standard, and access to driveways and buildings would be maintained (Standard Measure **TT-2**).
11. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is mapped within the project area; therefore, there would be no conversion of farmland to non-agricultural use. Further, the project area does not contain forestland; therefore, there would be no conversion of forestland either.
12. The proposed project would maintain travel lanes at 12 feet wide. Shoulders on the bridge are proposed to be expanded from 1-foot-wide to 6-feet-wide, and roadway shoulders, which vary from 0 to 4 feet wide, would be widened to 4 feet. The proposed project would not change roadway capacity. No further analysis is necessary.
13. Traffic control associated with the proposed project is standard and similar to traffic control associated with other Caltrans projects. See Master Response 7 (Traffic and Emergency Response) for additional information on traffic control, Master Response 2 (Construction Duration) for the project schedule, and Master Response 6 (Local Economy) for economic impacts.

As noted above, the proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project. The project would realign Albion River North Side Road to intersect Albion Little River Road east of SR 1 to improve intersection operation and sight distance, and the Albion Little River Road intersection with SR 1 would be reconstructed to conform the new SR 1 alignment and profile, also improving sight distance. The widened shoulders would improve safety for both vehicles and multimodal users. Other intersections listed are not being modified as part of the project.

For information regarding bridge rehabilitation as an alternative, see Master Response 1 (Rehabilitation).

14. The Albion River Bridge Project is a bridge replacement project with logical termini and independent utility. All parts of the project have been analyzed in the environmental document. Cumulative impacts of the project have been assessed; see ED Section 3.7, *Cumulative Impacts.*

15. Chapter 8 of the Noise Study Report (NSR) includes a summary of noise levels produced by the loudest construction equipment anticipated for each phase. Hoe rams were included instead of jackhammers to represent a typical worst case noise level for construction activity requiring demolition—Federal Transit Authority and the FHWA noise guidance show typical maximum levels for hoe rams as 90 dBA Lmax at 50 feet, which is greater than jack hammers, which range between 85 dBA and 89 dBA Lmax at 50 feet. Heavy-duty trucks were included in the construction equipment list. During clearing and grubbing, earthwork and bridge construction, the NSR assumes multiple heavy-duty trucks would be operating in the project area.

    Regarding cumulative noise levels, Table 8-1 of the NSR includes typical maximum and average hourly levels for individual pieces of equipment. Table 8-2 (mislabeled as Table 8-1 on page 33 of the NSR) includes typical maximum noise levels and average hourly noise levels by phase for typical daily construction activity. The average hourly noise levels shown in Table 8-2 assume all equipment is operating at the same time at the same location relative to a single receiver. This scenario creates a worst-case estimate of noise for each construction phase since it is unlikely all pieces of equipment are operating at the same time in the same location during construction operations. The estimated maximum level is for the single loudest piece of equipment during each construction phase.

    The table provided by the commentor shows cumulative maximum level and cumulative average level. Cumulative maximum levels for all equipment are not considered, as it is not anticipated that equipment would be operating for prolonged periods immediately adjacent to one another—they would not cause additive effects of the maximum sound levels for all equipment at a single location. The average level provided by the commentor is slightly lower than the average hourly equivalent included in the NSR. This is most likely attributed to

the fact the NSR assumes there could be multiple pieces of equipment operating in the area that contribute to the hourly average.

The NSR was prepared consistent with the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (TENS). As sound propagates from the source geometric spreading, ground absorption, meteorologic conditions, and shielding have an effect on the received noise levels. The NSR considers the effects of geometric spreading to estimate construction noise levels. Evaluating metrological effects can be complex due to the variability in metrological conditions throughout the day. Metrological conditions can have a positive or negative effect on the received noise level. The TENS manual states that present policies and standards assume zero wind for noise analyses. The NSR is believed to present an overall worst-case assessment of potential noise impacts, even with consideration of atmospheric effects (wind, etc.). This is because the construction noise evaluation does not include considerations for ground absorption or shielding effects.

Chapter 6 of the NSR includes several short-term noise measurements and one long-term noise measurement for ambient noise at various locations around the Albion Bridge (see Figure 5-1 in the NSR for locations and Table 6-2 for noise levels at the long-term measurement location).

The NSR includes adequate information for determining potential impacts to humans and avian species evaluated using the A-weighted noise levels. Impacts from underwater and airborne noise on special status species were assessed in the Natural Environment Study prepared for the project.

It is unclear what standard the commentor is using to support their claim that noise levels would exceed the maximum safe noise exposure limits. However, the contractor would be responsible to abide by all OSHA standards relating to noise exposure limits during construction.

The NSR acknowledges construction noise could intermittently dominate the noise environment. Caltrans Standard Specifications restrict construction noise to less than 86 dBA Lmax at 50 feet between the hours of 9 p.m. and 6 a.m. Additionally, **AMM-NOI-1** includes more restrictive work windows requiring work to be conducted between 7 a.m. and 7 p.m. When work cannot be completed during this time, notifications would occur, and additional noise controls would be implemented. Other measures include limiting idling near residential areas and acoustic shielding around pile driving hammers.

The NSR prepared for the project is sufficient. The project would not have significant noise impacts under CEQA (see ED Section 4.3.13, *Noise*). No updates are necessary.

4.4 ALBION BRIDGE STEWARDS PETITION

Attached: petitions in favor of preserving the Albion River Bridge

JH Jim Heid <acab@mcn.org>
To albionbridge@DOT
Cc Jim Heid
Retention Policy Enforced: All 2 Years (2 years) Expires 9/6/2026

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Walker:

1

Please find attached scanned copies of five petition sheets encouraging the preservation and maintenance of the historic Albion River Bridge. Please add these to the public comment file for the Albion River Bridge project.

Hard copies will be arriving at your office on Monday, September 9.

Thank you,
Jim Heid

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Melody Merriman	Melody Merriman	Box 521 Little River Ca
James Garretson	James Garretson	PO Box 481 Little River 95456
Steven Zay Granberg	Zay	32670 middle Ridge Albion
Randy Pene	Randy Pene	PO Box 635 Albion Ca 95410
Karen Latham	Karen Latham	P.O. Box 63 Albion 95410
Ceril Lisbon	Ceril Lisbon	PO Box 854 Mendocino 95460
Rosa Wyglendowski		PO Box 552 Albion, CA. 95410
Fabre Reigu King Gallo		32771 Navarro Ridge Rd Albion 95410
Ed Davis		5466 Barre Ave., Stockton, CA 95212

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

Ed Davis

funlovinfive@sbcglobal.net

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Heidi Baldassare	Heidi Baldassare	19261 Basin View FB 95437
Edward Lott	Edward Lott	30410 Simpson Lane 95437 Fort Bragg
Gabe DeSmidt	Gabe DeSmidt	7335 Rockwood Ave El Cerrito, Ca 94530
Alva Leung	Alva Leung	7335 Rockwood Ave El Cerrito CA 94530
Stan Thornton	Stan Thornton	32660 Middle Ridge, Albion P.O. Box 599 95410
Wade Huff	Wade Huff	32293 Middle Ridge Rd Albion CA 95410
Bill Rogers	Bill Rogers	31695 Middle Ridge 95410
Lorel Stein	Lorel Stein	32700 Middle Ridge Rd. Albion 95410
Robert Hathorn Sklar	Robert Hathorn Sklar	32295 Middle Ridge Road, Albion
Virginia Reed	Virginia Reed	32101 Middle Ridge Rd Albion 95410

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Melody Merriman	Melody Merriman	Box 521 Little River Ca
James Garretson	James Garretson	PO Box 481 Little River 95456
Steven Zay Granberg	Zay	32670 middle Ridge Albion
Randy Pene	Randy Pene	PO Box 635 Albion Ca 95410
Karen Latham	Karen Latham	P.O. Box 63 Albion 95410
Ceril Lisbon	Ceril Lisbon	PO Box 854 Mendocino 95460
Rosa Wyglendowski		PO Box 552 Albion, CA. 95410
Fabre Reigu King Gallo		32771 Navarro Ridge Rd Albion 95410
Ed Davis		5466 Barre Ave., Stockton, CA 95212

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

Ed Davis funlovinfive@sbcglobal.net

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

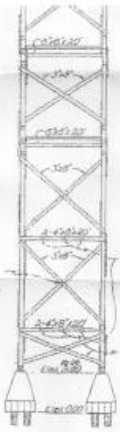
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Ned Huff	Ned Huff	PO box R 33 Albion, CA. 95410
Larry Miller	Larry Miller	PO. Box 432 Albion CA. 95410
Steve Adzer	Steve Adzer	Box 325 Albion Ca. 95410
Larry Sawyer	Larry Sawyer	Box 220 Albion 95410
Harriet Bye	Harriet Bye	Box 220 Albion 95410
Eli Bye	Eli Bye	Box 220 Albion CA 95410
Keith Lusen	Keith Lusen	Box 98 Albion 95410
Shawn Burns	Shawn Burns	725 Quail Trail Colfax CA 95713
Wendy Fahey	Wendy Fahey	PO Box 1082 Point Arena CA 95468
Maria Santillan	Maria Santillan	P.O. Box 451 Point Arena 95468

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Karen Bakofsky	Karen Bakofsky	1083x21, Albion 95410
Helen Jacobs	Helen Jacobs	PO Box 294 Albion CA 95410
Dobie Dolphin	Dobie Dolphin	Box 294 Albion 95410
Donna Kimball	Donna Kimball	dmokimball@gmail.com
Alix Phillips		alix_phillips@yahoo.com
Sharon Parker	S Parker	deerhaven@sbcglobal.net
Wendi Felson	Wendi Felson	wfelson@gmail.com
Rebecca Reynolds	Rebecca Reynolds	Rebeccareynolds0519@icloud.com
Mary M Meline	Mary M Meline	25209 N. Hwy 1 F.B.
Nancy Jane Fish		P.O. Box 72 95410 Albion, Ca.

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

Attached: additional petitions from Albion Bridge Stewards

JH Jim Heid <acab@mcn.org>
To albionbridge@DOT
Cc Jim Heid
Retention Policy Enforced: All 2 Years (2 years) Expires 9/9/2026

Bridge petition A11.PDF
2 MB

EXTERNAL EMAIL. Links/attachments may not be safe.

Please find attached scanned copies of additional petition sheets encouraging the preservation and maintenance of the historic Albion River Bridge. Please add these to the public comment file for the Albion River Bridge project.

Hard copies of these will *not* be arriving at your office today, as we received them over the weekend.

Thank you,
Jim Heid
Albion Bridge Stewards

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Anne D. Kight	Anne D. Kight	29019 Albion Ridge, Albion, CA.
Corina Urban	Corina Urban	32125 Albion Ridge Rd
Ella Urban	Ella Urban	32125 Albion Ridge Rd., CA 95410
DAVID WERNER		32691 MIDDLE RIDGE RD, ALBION
		8175 Catlow Spring Rd Ukiah 95482
Elizabeth Ruel		PO Box 695 Albion 95410
Sandy Nelson	Sandy Nelson	38350 Albion Ridge Rd Albion 95418
AUSTYN TAYLOR		32305 Middle Ridge Rd Albion CA 95410
JOANN BRITTON	JoA Britton	6018 Albion Little River Rd 95456

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

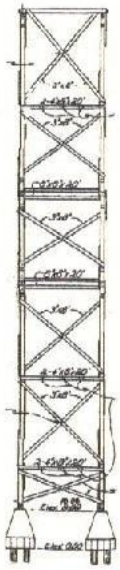
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Julie Davis	Julie Davis	5466 Barre Ave. Stockton, CA 95212
Joel Kies	Joel Kies	31591 Middle Ridge Rd. Albion CA 95410
Giovanna Pagano		6901 Rd 19 Little River 95456
Liz Dembski		94117
Jason Mendelson		1410 Page St San Francisco Apt 6 ca. 94117
Barbara Lindquist	Barbara Lindquist	31695 Middle Ridge Rd 95410
Wendy Stoppelbey		32700 Middle Ridge Rd, Albion 95410
Sara Crystal		39300 Albion Ridge Rd Albion Ca 95410
Michael Higgins		25800 Fen View Lane Ft. Bragg CA 95437
Owen Elisha		31480 I Rd. 95410

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

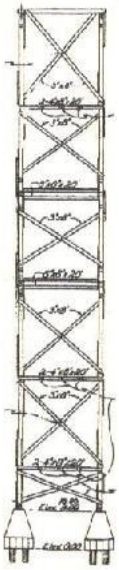
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Loreen Hamante		
Dr. Robert Spies		spies.b@gmail.com
Jan DeSipio		sheu@mcn.org 95410
Tom Wodetzki		tw@mcn.org
Rob Bush		Robbrea@mcn.org
CHRISTINE BERCHEN		christineberchen@mcn.org
SARA E FOWLER		sfowler@mcn.org
Rita Crane		ptemple@mcn.org
Rixanne Wehren		rixanne@mcn.org
Alison Gardner		garaway59@gmail.com

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

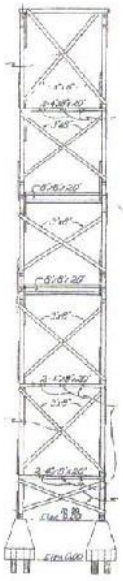
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Michael A Carpenter	Michael Carpenter	PO Box 35 Albion Ca. 95410
Warren DeSmidt	Warren DeSmidt	P.O. Box 533 Albion 95410
JANET EKLUND	Janet Eklund	PO Box 186 ALBION 95410
Stella Wells		P.O. Bx 1399 Mendocino, Ca 95460
Jane Locke	PO Box 1364	Fort Bragg Ca 95437
CHRISTINA SANSI	Christina Sansi	30600 MIDDLE RIDGE ALBION, CA. 95410
Megan Sacks	Megan Sacks	4397 Rd 409 Mendocino CA 95460
Frances Casey	Frances Casey	42451 Comptche Ukiah Rd 95460
Isa Faulk	Isa Faulk	Comptche, CA 95427
Christine dePierro		PO Box 261 Comptch, Ca 95427

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Dianne Tobias	D Tobias	detobias@aol.com
Rick Childs	Rick Childs	rick@mcn.org
Bev Karkruff	bkar@mcn.org	Bev Karkruff
Liz Helenchild	LizHelenchild	djliz@mcn.org
Carrie Durkee	Carrie Durkee	cdurkee@mcn.org
Katie Wheeler	Katherine Wheeler	katherinedwheeler@gmail.com
Richard Childs	Richard Childs	95460
Lee Zabin	Lee Zabin	leez@mcn.org
Jan DeSipio	Jan DeSipio	shen@mcn.org
Peter Temple	Peter Temple	ptemple2@mcn.org

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

From: Jim Heid
To: albionbridge@DOT
Cc: Jim Heid
Subject: attached: additional petition sheet regarding Albion River Bridge project
Date: Monday, September 9, 2024 4:23:42 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Please find attached a scanned copy of one additional petition sheet encouraging the preservation and maintenance of the historic Albion River Bridge. Please add this to the public comment file for the Albion River Bridge project.

Thank you,
Jim Heid

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

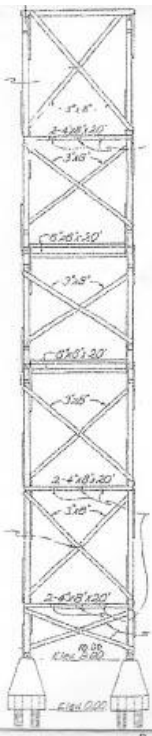
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Jeannette Raster	Jeannette Raster	Albion, 95410 jraster1@gmail.com
ROBERT CUTLER	Robert Cutler	PO Box 278, Albion, CA 95410
Steven Antle	Steven Antle	PO Box 41 Mendocino, CA 95460
Carla Jupiter	Carla Jupiter	PO Box 1046 Mendocino, CA 95460

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

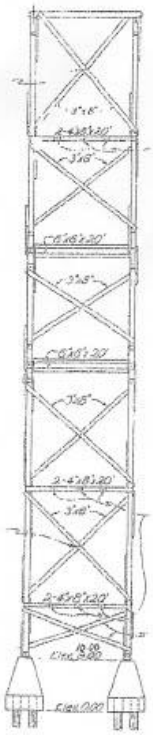
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Alison Gardner	Alison Gardner	Box 838, Albion, CA 95410
CRAIG HATHAWAY		POX 838 ALBION, CA 5540
MARTA MACKENZIE	Marta MacKenzie	Box 2377, Ft Bragg, CA 95437
Jeanne Williams	Jeanne Williams	39600 Airport Rd Gualala, CA 95445
Anne Kessler	Anne P. Kessler	Box 147 Point Arena CA 95468
Stephen Nepove	Stephen Lyon	39600 LR Airport Rd LR 95456
Sophia Sutherland	Sophia Sutherland	4601 Cameron Elk 95432
Lucille Rickery	Lu Rickery	14981 Navarro Way 95459
Clarke Kenyon	CLARKE KENYON	P.O. Box 96 Elk CA 95468 95432

fill out & return to ABS, PO Box 363, Albion CA 95410



Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

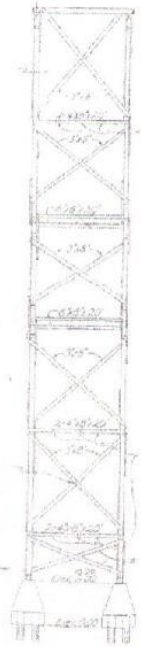
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Eric I Miller		P.O Box 232 Albion CA 95410
Lee Zabin		leez@mcn Albion CA 95410
Greg Nicholson		Albion CA 954[illegible]

fill out & return to ABS, P.O. Box 363, Albion CA 95410



Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

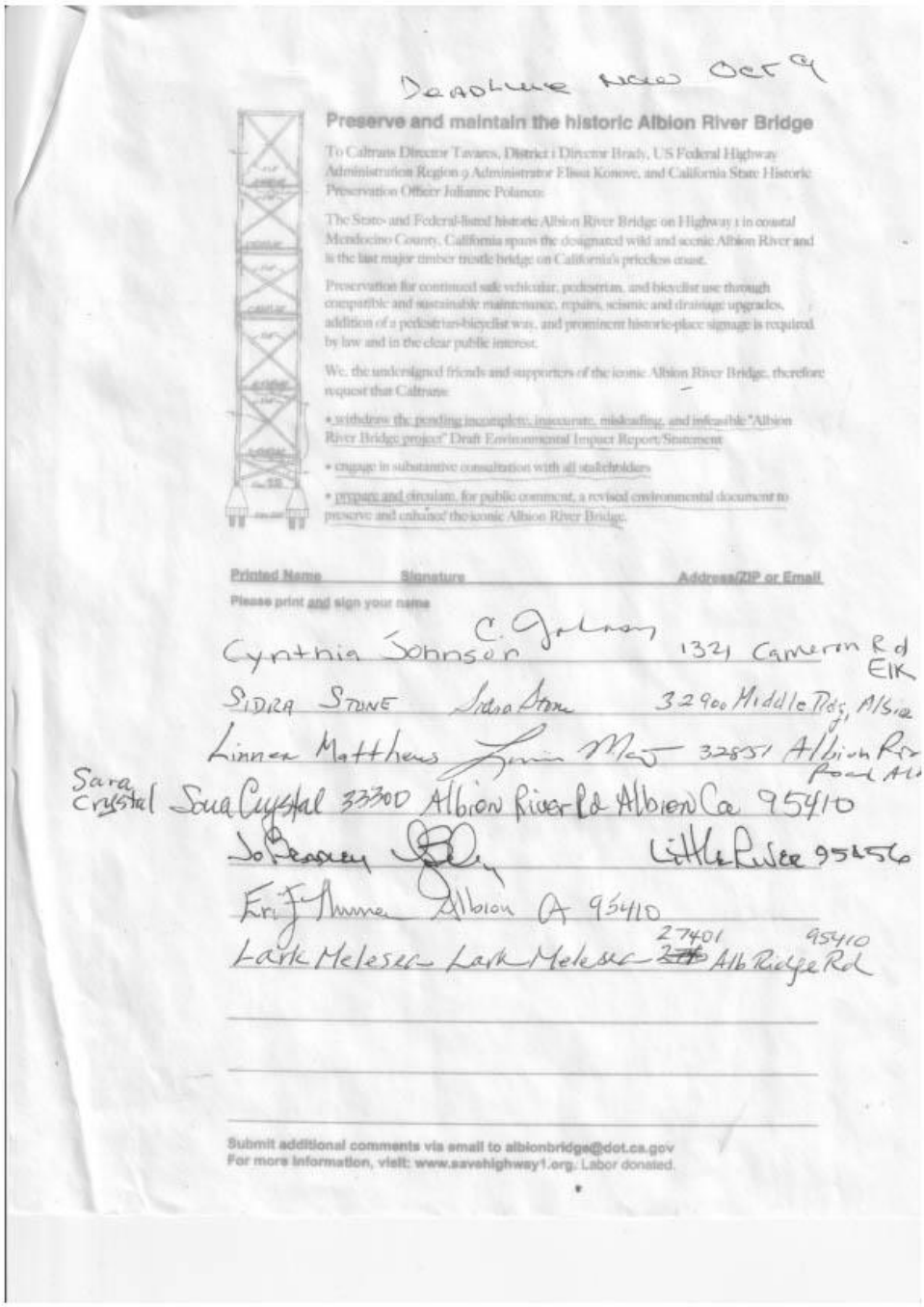
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
BEVERLY ENGELHARDT	Beverly A Engelhardt	33851 NAVARRO ALBION 95410
JOHANNA SCHMIDT	Johanna Schmidt	33851 NAVARRO DR. ALBION 95410
JAN KRAJEWSKI		44051 COMPTCHE UKIAH RD 95460
H.W. MACDONALD		helencoding@gmail.com
Debra Kruse	Debra Kruse	bbkruse@live.com
Beatrice Kansh	Beatrice Kansh	blueravy102@hotmail.com

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



Deadline Nov 9

Preserve and maintain the historic Albion River Bridge

To Caltrans Director Tavares, District 1 Director Brady, US Federal Highway Administration Region 9 Administrator Elissa Konove, and California State Historic Preservation Officer Julianne Polanco:

The State- and Federal-listed historic Albion River Bridge on Highway 1 in coastal Mendocino County, California spans the designated wild and scenic Albion River and is the last major timber trestle bridge on California's priceless coast.

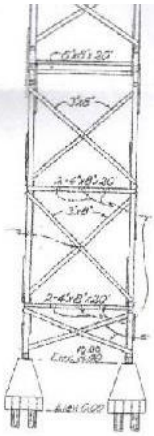
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Cynthia Johnson	C. Johnson	1321 Cameron Rd EIK
SIDRA STONE	Sidra Stone	32900 Middle Rdg, Alb 12
Linnea Matthews	Linnea Mat	32851 Albion River Road Alb
Sara Crystal	Sara Crystal	33300 Albion River Rd Albion Ca 95410
Jo Peasley	Jo Peasley	Little River 95456
Eric Thomas	Eric Thomas	Albion CA 95410
Lark Melesse	Lark Melesse	27401 ~~27410~~ Alb Ridge Rd 95410

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



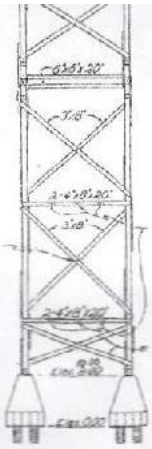
Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Morgan Peterson	Morgan Peterson	30050 Sherwood Ft Bragg CA 95437
Larry Miller	Larry Miller	lam602@mcn.org
T White	T White	townsgolf@gmail.com
Peter White	Peter White	best@mcn.org
Stephen G. Scalmanini	Stephen G. Scalmanini	sscalmanini@yahoo.com 907 N Oak St Ukiah 95482
Antonina Esposito	Antonina Esposito	anniesposito@gmail.com 907 N Oak St Ukiah CA 95482
James Schoonover	James Schoonover	jastjim@mcn.org
Edward Rice	Edward Rice	frrice@movingpartspress.com
Beth Bosk	Beth Bosk	p.o. box 702 Mendocino 95460
Robert Deimer	Robert Deimer	pob 702 Mendocino 95460

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.



Preservation for continued safe vehicular, pedestrian, and bicyclist use through compatible and sustainable maintenance, repairs, seismic and drainage upgrades, addition of a pedestrian-bicyclist way, and prominent historic-place signage is required by law and in the clear public interest.

We, the undersigned friends and supporters of the iconic Albion River Bridge, therefore request that Caltrans:

- withdraw the pending incomplete, inaccurate, misleading, and infeasible "Albion River Bridge project" Draft Environmental Impact Report/Statement
- engage in substantive consultation with all stakeholders
- prepare and circulate, for public comment, a revised environmental document to preserve and enhance the iconic Albion River Bridge.

Printed Name	Signature	Address/ZIP or Email
Please print and sign your name		
Lawrence Anthony Costa III		1021 S. Main St. #3 Fort Bragg, Ca 95437 POB 424
GERALD SOMMER	Gerald Sommer	ALBION CA 95410 pob 568 Albion Ca. 95410
Debby Sommer	Debby Sommer	debbyonearth@hotmail.com
ERIF THONEN		Box 184 Albion CA 95410
JOHN R. HANSEN,		BOX 490 ALBION, CA 95410
FRANK MADERA		BOX 202 GIG HARBOR WA 98335
JACOB PATTERSON		jacob@lawjrp.com POBox 2814 FORT BRAGG, CA 95437
Ellen McCann		469 S. McPherson St. Fort. Bragg. CA 95437
Jeanne Stubenrauch	Jeanne Stubenrauch	321 S. Harrison St. Fort Bragg P.O. Box 945 Fort Bragg, CA 95437

Submit additional comments via email to albionbridge@dot.ca.gov
For more information, visit: www.savehighway1.org. Labor donated.

Response to Albion Bridge Stewards Petition

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/ Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   To ensure that the public had adequate opportunity to comment, two public meetings were conducted—one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period.

   The Albion Bridge Stewards are acknowledged as a consulting party pursuant to NHPA Section 106. For a summary of coordination efforts with the agencies and general public, including the Albion Bridge Stewards, see ED Chapter 5, *Comments and Coordination*.

   Developed in accordance with 40 CFR 1502.13 and 14 CCR 151.24(b), the ED identifies a purpose, need, and project objectives, and analyzes a reasonable range of alternatives. The purpose of the proposed project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   A revised EIR/EIS is not warranted.

4.5 AMPHIBIAN REFUGE

Amphibian Refuge

Website: amphibianrefuge.org

11225 Morocco Road NE
Albuquerque, NM 87111

July 11, 2024

State of California
Department of Transportation (Caltrans)
Albionbridge@dot.ca.gov

RE: Comment on Albion River Bridge Project, Draft Environmental Impact Report, Draft Environmental Impact Statement

Dear Caltrans:

1

Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, and climate change. Amphibians are the most threatened class of vertebrates.

Amphibian may be present at the Albion River Bridge Project area. We recommend pre-construction surveys to verify that amphibians, such as the northern red-legged frog, will not be impacted by the project.

Thank you for this opportunity to comment.

Eric R. Johnson

Eric R. Johnson
Executive Director

References:

Catenazzi, A. 2015. State of the World's Amphibians. *Annual Review of Environment and Resources, 40: 91-119.*

Collins, J.P., and M.L. Crump. 2009. *Extinction in Our Times: Global Amphibian Decline.* New York, NY: Oxford University Press.

Green, D.M., L.A. Weir, G.S. Casper, and M.J. Lannoo. 2013. *North American Amphibians, Distribution and Diversity.* Berkeley, CA: University of California Press.

Kolbert, E. 2014. *The Sixth Extinction, an Unnatural History.* New York, NY: Bloomsbury.

Luedtke et al. 2023. Ongoing Declines for the World's Amphibians in the Face of Emerging Threats. *Nature, Volume 622, 12 October 2023, 308-314.*

McCallum, M.L. 2007. Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. *Journal of Herpetology, Volume 41, Number 3, pp. 483-491.*

Response to Amphibian Refuge

1. An Aquatic Species Relocation Plan or equivalent would be included as part of the project. This plan would include provisions for pre-construction surveys and the appropriate methods or protocols to relocate any species found. See Standard Measure **BR-2(H)** under Section 2.2.5, *Common Design Features of the Build Alternatives.*

4.6 CALIFORNIA NATIVE PLANT SOCIETY – DOROTHY KING YOUNG CHAPTER

California Native Plant Society
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501
albionbridge@dot.ca.gov

September 9, 2024

Dear Ms. Walker:

On behalf of The California Native Plant Society (CNPS), Dorothy King Young Chapter (DKY) of the Mendocino Coast, I am submitting the following comments on the Draft Environmental Impact Report/Statement for the Albion River Bridge project. CNPS is a science-based statewide nonprofit organization whose mission is to protect California's native plants and their natural habitats, today and into the future. The DKY chapter's conservation focus is on the native plants and vegetation of the Mendocino coast region, and adjacent northern Sonoma coast. I am currently the DKY conservation chair, and a professional coastal ecologist and botanist. My expertise includes restoration, regulation, management, and recovery of endangered species and their ecosystems. I have surveyed the Albion River estuary and its wetlands for over two decades. The CNPS DKY comments rely primarily on review of the DEIR/S and its Natural Environment Study (NES), citing biological surveys conducted by the consulting firm ICF.

1

CNPS DKY is concerned about multiple aspects of the project's impacts to native vegetation and special-status plants covered in the EIR that are either:

- omitted, lacking analysis and explanation altogether,
- proposed to be mitigated on-site by vague on-site restoration measures (revegetation of disturbed soils after mechanical vegetation removal and grubbing removing upper soil horizons) that are not sufficiently described to demonstrate a reasonably likelihood of feasibility and sustainability, or
- proposed to be mitigated off-site by purely speculative compensatory mitigation at the still-pending Mendocino Coast Mitigation Bank, which is not explained in terms of regulatory enforceability after the 2023 Supreme Court ruling that eliminates federal wetland jurisdiction above tidal range of the Albion River.

California Native Plant Society
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

1. **Sensitive plant species and Biological Study Areas.**

2

The special-status plant species evaluated within the Biological Study Area appear to be adequately surveyed over a ten year period by qualified botanists from Caltrans and ICF, but most of the survey period was in an extreme historic drought, when many plant species are less likely to either emerge from seed banks or be detected in flower. Because there is a likelihood that project permitting and construction will occur after a biologically significant lag time after DEIR floristic surveys described in section 2.4.5., repeated post-drought surveys will be needed to validate past surveys during project permit stages. The drought-era surveys must be assumed to be obsolescent as a basis for impact assessment. This is particularly true for dynamic plant populations with high turnover and changes in configuration and area, such channel bed colonies of eelgrass, *Zostera marina*.

3

The greater deficiency of the surveys is the limitation of upstream estuary area included in the BSA, which does not account for potential upstream tidal choking or damping effects of temporary bridge construction on native estuarine vegetation. The potential effects area of the estuary upstream must include Lyngbye's sedge, *Carex lyngbyei*, which is widespread upstream of the campgrounds.

2. **Direct tidal hydrology impacts and indirect ecological impacts to submerged aquatic vegetation.**

4

The DEIR concedes that direct project footprint impacts to eelgrass, *Zostera marina*, may be unavoidable (p. 183 NES). Destruction of submerged estuarine beds of eelgrass vegetation is a significant potential impact because they are subject to worldwide and statewide decline, subject to mass die-back during extreme climate events, and are notoriously difficult to re-establish. They support extremely valuable foraging, breeding, and shelter habitat for many important fish and invertebrate species, including Dungeness crab and listed juvenile salmonids. The DEIR does not explain how the purely passive "mitigation" measures of removing structures to create suitable potential habitat for eelgrass would predictably result in occupied, colonized, and sustainable habitat. Neither the DEIR nor the NES cites any restoration plan for the project, or comparable plan as a model, that explains or demonstrates the feasibility of the proposed mitigation measure for eelgrass impacts. The DEIR provides no basis whatsoever to expect spontaneous and sustainable recolonization of eelgrass would occur in destabilized sediments post-project, or areas with artificial structures removed at unspecified locations in the estuary.

Protecting California's native flora since 1965
2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • www.cnps.org
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

California Native Plant Society
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

5

Submerged aquatic vegetation beds like eelgrass are sensitive to short-term seasonal changes in estuarine tidal circulation that affects seawater residence time, surface temperatures, and salinity. The DEIR section on hydrology, 3.3.1, provides no hydraulic analysis of potential in-stream structure impacts on short-term tidal circulation restrictions for the estuary upstream of the project area. Specifically, the DEIR omits any assessment of in-stream structures cumulative tidal friction impacts during ecologically sensitive neap tide series in late summer, when damping of tidal range or choking of tidal flood flows by in-stream structures, like cofferdams and piers, could occur. The DEIR provides no information on the maximum reduction of cross-section channel area to be simultaneously occupied by structures that may restrict or delay flood tidal inflows or ebb tidal drainage during weak neap tide series during summer high temperature events.

Other Mendocino estuaries with highly variable, naturally choked tidal flows, such as the Ten Mile River estuary, undergo intermittent mass dieback of eelgrass, corresponding to heat stress or overgrowth of periphyton [attached leaf surface algae] during periods of reduced tidal circulation. These ecologically significant events can result in abrupt decline in eelgrass beds, in warm summer months during neap tide series. The DEIR biological resource impact section appears to provide no explanatory basis for impact assessment of in eelgrass ecology, in addition to omitting any analysis of potential tidal circulation impacts during weeks of summer neap tides.

3. **On-site compensatory mitigation for native vegetation stands**

6

For direct impacts to native vegetation, the DEIR proposes on-site compensatory mitigation measures that are programmatic, general, and prospective, but not explained in terms of a basis of feasibility:

> ....the Revegetation Plan would incorporate species-specific measures such as seed collection, plant salvage, and/or plant establishment procedures to ensure successful replanting within temporarily disturbed areas.

The revegetation measures proposed the DEIR lack any relevant information about species-specific or site-specific mitigation feasibility, where it is certainly needed. The DEIR provides no explanation of mitigation feasibility for replacement of mature coastal soils and vegetation stands on disturbed substrates where upper soil horizons and root/fungal structure has been eliminated and replaced by exposed subsoil or disturbed, graded low bulk-density soils, which competitively favor invasive non-native species in the long-term. The DEIR cites results of no comparable short-term or long-term revegetation efforts in similar coastal environments to explain the basis for expecting effectiveness of

Protecting California's native flora since 1965
2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • www.cnps.org
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

California Native Plant Society
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

revegetation for the species and vegetation types proposed to be mitigated. Because many mature coastal vegetation stands, such as silk-tassel oak (*Garrya elliptica*), established slowly over long periods of time in cooler, wetter past climates and lower sea levels, the DEIR's failure to explain the basis of revegetation feasibility makes the proposed mitigation speculative and unenforceable.

This mitigation deficiency applies to all the sensitive special-status plant species or vegetation types proposed for on-site mitigation by revegetation. The DEIR, table 55 and related text, asserts that there are no anticipated impacts to special-status wetland plants in the project area except minor temporary impacts to Point Reyes checkerbloom, *Sidalcea calycosa* ssp. *rhizomata*, and Harlequin Lotus, *Hosackia gracilis*. Neither of these species tend to persist in wetland habitats after major soil disturbance. The DEIR does not explain how either revegetation or off-site mitigation bank credits would feasibly compensate for "temporary" impacts to these species.

7

4. **Off-site Mendocino Coast Mitigation Bank MCMB reliance and enforceability (post-Sackett v. EPA)** For permanent impacts that cannot be restored on-site, Caltrans proposes to compensate for permanent impacts to sensitive natural communities by purchasing credits from the commercial Mendocino Coast Mitigation Bank, operated by the RES corporation. The DEIR states that "appropriate measures and credit ratios would be identified and coordinated through the USACE, NCRWQCB, and any other administering agencies during the permitting phase of the project; a 2:1 ratio is proposed as adequate compensation provided the MCMB establishment".

The DEIR does not explain how a private commercial mitigation bank that has only "pending" status, permitted merely by a "prospectus" for federal wetland mitigation credits, but is not currently operating or demonstrating actual restoration efficacy, can provide mitigation for project impacts. The DEIR does not explain how the federal lead agency for administering and enforcing the terms and conditions of the RES-MCMB, the U.S. Army Corps of Engineers, could possibly continue this role after the de-federalization of Albion River Bridge vicinity wetlands above tidal range of the Albion River in 2023. The Supreme Court decision of Sackett v. EPA eliminated any potential foreseeable authority of the USACE to oversee the operation of this and all other wetland mitigation banks that provide credits for non-tidal wetlands that are not connected to a continuous water surface of a navigable water body. The DEIR has explained no State administrative lead role for enforcing the MCMB credit system for non-tidal wetlands, such as those of the Albion River Bridge project. All MCMB-based mitigation credits must be presumed to be purely speculative and unenforceable until this is settled by state and federal partner agencies overseeing the operation of the MCMB, and the DEIR does not appear to address this at all. All

California Native Plant Society
Dorothy King Young Chapter, P. O. Box 577, Gualala, California 95445

federal wetland delineations for the project cited by the DEIR appear to be conducted prior to 2023 and the Sackett v. EPA ruling.

Obviously, the FEIR will need to revise all federal wetland determinations for the project post-Sackett. Presumably, state wetland jurisdictions in the project area have not changed with wetland de-federalization above tide.

5. **Conclusions and recommendations**

8

The DEIR does not reasonably explain the basis for mitigation feasibility or efficacy regarding native plants and vegetation. The DEIR fails to identify potentially significant indirect estuarine impacts due to tidal circulation changes that may be seasonally biologically significant. The DEIR should be recirculated to correct these deficiencies.

Respectfully submitted,

Peter Baye

Peter Baye,
Conservation Chair, CNPS-DKY

Response to CNPS

1. See responses to comments below.
2. Botanical surveys would be updated prior to construction (see Standard Measure **BR-4**). In addition, for eelgrass, all necessary standards outlined in the California Eelgrass Mitigation Policy (CEMP) would be followed, which includes pre- and post-construction surveys (see Mitigation Measure **AMM-BR-8**).
3. The project is not anticipated to impact botanical species outside of the project's Environmental Study Limits (ESL), including from tidal choking or damping. Studies upstream of the ESL are not needed. See Response 5 below for more information on in-stream structures.
4. Eelgrass beds have important biological, physical, and economic values. Mitigation for eelgrass is described under **AMM-BR-8**; additional detail is provided in Appendix D, Section D.3.3, *Compensatory Mitigation for Seagrass*. All necessary standards outlined in the CEMP would be followed, including the development of a comprehensive mitigation and monitoring plan to ensure no net loss of eelgrass. Adaptive management may be needed for restoration efforts. Restoration to offset impacts to eelgrass would be developed in coordination with regulatory agencies.
5. Temporary trestles are discussed under the *Access and Staging* subsection of Section 2.2.5, *Common Design Features of the Build Alternatives*. Temporary trestles are anticipated to include 14- to 24-inch piles. There would be 5 to 10 piles per bent, with bents spaced approximately 30 feet apart. In addition, temporary trestles would not all be in place at once. For example, while the equipment trestle for Alternatives 1 and 2 would be put in place in the first year of construction, the trestle for bridge removal would only be in place for the third year of construction. See Section 2.2.6, *Unique Features of Build Alternatives,* for more information. Temporary trestles would span the deepest part of the river (thalweg); they would be situated in the low flow channel sides, out of the higher velocities of the river. The Draft Hydraulics and Sediment Analysis Report identified potential changes to site hydraulics caused by installation of the temporary trestles found that the changes in hydraulics would be minor and localized around the trestle piers.

   Cofferdams would be in place below the ordinary high water mark (OHWM) for construction of a bridge pier for Design Options 1A and 3A, and for removal of the existing pier on the south side of the river for all alternatives. No cofferdams would be installed below the OHWM for Design Options 1B, 2A, or 2B, and would not be installed around temporary trestle piers. The new piers for Design Options 1A and 3A and the existing southern pier are at the edges of the channel, outside of the thalweg. Cofferdams would be placed at a distance of approximately 1 foot, or as close as possible, from the edge of the piers being constructed or removed and would only be in place for these activities. For example, the cofferdam for the removal of the existing pier is anticipated to be in place only in the third year of construction for all alternatives, when this work is anticipated to

occur. See Section 2.2.6 for more information on the construction scenario for each alternative.

The project would not greatly reduce the cross-section of the channel during construction. Impacts to hydraulics of the river during construction are anticipated to be minor and temporary. While there may be a small amount of scour surrounding the temporary piles, once they are removed, channel morphology and substrate changes, if any, would be expected to return to normal, and therefore would only have minor effects on eelgrass. However, as noted above, the project would include mitigation for eelgrass as described under **AMM-BR-8** to ensure no net loss of this community.

6. Revegetation is a standard part of the project (see Standard Measure **BR-4[B]**) and is not considered mitigation under CEQA. The revegetation plan would be prepared during the permitting phase of the project and would be coordinated with regulatory agencies. It would contain a plant palette, establishment period, watering regimen, monitoring requirements, and invasive plant species control measures. The plan would also contain measures specific to impacted communities and special status species, such as seed collection, plant salvage, and/or plant establishment procedures to ensure successful replanting within temporarily disturbed areas.

   Under CEQA, the project is not anticipated to have significant impacts to Point Reyes checkerbloom or harlequin lotus. Therefore, no mitigation is required for these species. Neither Point Reyes checkerbloom or harlequin lotus is within the cut/fill boundary or anticipated permanent impact area for the project; disturbance is primarily from staging or other temporary ground disturbance due to nearby work. In addition, measures such as wetland protection mats would be used to limit damage to the soil and seedbank around Point Reyes checkerbloom, which grows in wetlands (Standard Measure **BR-5[D]**), and the relative abundance of this species in the general vicinity of the project and, in particular, the close proximity of the plants and habitat adjacent to temporarily impacted areas would facilitate re-colonization of disturbed and temporarily impacted habitat. Impacts to harlequin lotus would be temporary in nature, and there is an abundance of this species in the area.

   In addition, as noted above, the project's revegetation plan would include species-specific measures—for example, replanting harlequin lotus along the drip line of coyote brush, where it was often found growing in non-native grasslands and which may be especially important in providing shade and moisture retention for seedlings in dry years.

   For other sensitive natural communities that may have significant effects under CEQA, impacts that cannot be restored onsite would be compensated for as described in accordance with **AMM-BR-1**.

7. A summary of the Mendocino Coast Mitigation Bank Project in Appendix D, Section D.3.1, *Mendocino Coast Mitigation Bank Project*, provides information on the status of the bank and its use as a foreseeable mitigation option. Caltrans has executed contracts with RES Environmental Operating Company, LLC (RES)

to procure mitigation credits in coastal Mendocino. The prospectuses are legal documents that are approved by regulatory agencies; a prospectus has been completed for Bank #1 and is being finalized for Bank #2. These contracts, in addition to RES' current progress (execution of land purchases, field analyses and studies, progress on prospectuses, organization of the Interagency Review Team [IRT], etc.), makes the development and creation of the Mendocino Coast Mitigation Bank a reasonably foreseeable mitigation option for the Albion River Bridge Project. In addition, Caltrans expects the bank to be established prior to anticipated project impact, with credit releases in 2025 for Bank #1 and 2026 for Bank #2. If the mitigation banks are not established prior to construction, Caltrans would consult with the regulatory agencies on mitigation that compensates for project impacts. Appropriate mitigation for the project would be enforced through permits obtained for affected resources.

The U.S. Army Corps of Engineers (USACE) is the agency that authorizes federal compensatory mitigation bank credits for losses of aquatic resources. The USACE coordinates with other agencies, which together form the Interagency Review Team (IRT), to make sure that credits in the bank would be appropriate for the agencies involved. Agencies involved in the discussion of the banks include the U.S. Environmental Protection Agency (U.S. EPA), National Marine Fisheries Service (NMFS), North Coast Regional Water Quality Control Board (NCRWQCB), California Coastal Commission (CCC) and California Department of Fish and Wildlife (CDFW). Mitigation banks may include credits for resources that are not under the jurisdiction of the USACE (33 Code of Federal Regulations [CFR] Part 332). Therefore, the changes to federal jurisdictional features resulting from the Sackett v. Environmental Protection Agency (EPA) decision does not affect the Mendocino Coast Mitigation Bank. As stated above, the mitigation bank is a reasonably foreseeable mitigation option for the Albion River Bridge Project, which would contain credits that satisfy the conditions of multiple agencies. In addition, in line with the mitigation measures in the environmental document, mitigation would be coordinated with administering agencies in the permitting phase of the project.

As noted in the comment, wetland delineations were conducted prior to the Sackett v. EPA ruling, which found that the Clean Water Act (CWA) extends only to wetlands that have a continuous surface connection with "waters" of the United States. This reduces federal jurisdiction; some wetlands mapped as being under USACE jurisdiction for the project may no longer be federally protected.

The jurisdiction of wetlands is subject to USACE determination. For the purposes of the environmental document, estimates of federally protected wetlands and associated impacts are likely an overestimate. However, all wetlands identified as waters of the U.S. are protected by the state as well under Section 401 of the CWA (see ED Table 52). Overall impacts to protected wetlands are adequately addressed. A preliminary jurisdictional determination would be obtained from the USACE after the final environmental document. The Aquatic Resource Delineation Report, which includes mapping of potential waters of the U.S. and supporting documentation, would be submitted to the

USACE for their review and they would then provide their preliminary jurisdictional determination. Potential federally jurisdictional wetlands would be updated at this time.

8. See comment responses above. The draft environmental document was sufficient, and recirculation is not required.

4.7 CENTER FOR BIOLOGICAL DIVERSITY

Comments submitted via email to albionbridge@dot.ca.gov

September 9, 2024

Caltrans
Attn: Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

RE: Inadequate Range of Alternatives for Albion River Bridge Draft EIR/EIS

Dear Ms. Walker,

1

These comments are submitted on behalf of the Center for Biological Diversity, a non-profit public interest conservation organization with more than 1.7 million members and supporters dedicated to protecting imperiled species and their habitats. The Center is dedicated to protecting the coastal environment from the impacts of development, including bridge construction in endangered coho salmon habitat.

The California Department of Transportation (Caltrans) proposes to replace the existing Albion River Bridge (Caltrans Bridge #10-0136) on State Route (SR) 1 in Mendocino County. The Draft Environmental Impact Statement/Environmental Impact Review (DEIS/DEIR) prepared pursuant to the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) considers three alternatives for bridge replacement and one no-action alternative, but fails to consider a strategy for rehabilitating the current bridge to make it seismically sound to satisfy the project's purpose and need. Draft at S-ii. ("The purpose of this project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs.")

Caltrans' failure to consider a reasonable range of alternatives violates both NEPA and CEQA. By *only* evaluating bridge replacement, or a no-action alternative that does not meet the project's purpose and need, Caltrans has violated its obligation to provide legitimate consideration to "alternatives that fall between obvious extremes." *Neighbors of the Mogollon Rim, Inc. v. U.S. Forest Serv.*, 2023 U.S. App. LEXIS 11031 (9th Cir. 2023); *see also Westlands Water Dist. v. U.S. Dep't of Interior*, 376 F.3d 853, 868 (9th Cir. 2004) (When reviewing whether an agency considered an adequate range of alternatives, the

Alaska . Arizona . California . Colorado . Florida . Hawaii . N.Carolina . New Mexico . New York . Oregon . Washington, D.C. . La Paz, Mexico
P.O. Box 710, Tucson, AZ 85702-0710 tel (520) 623.5252 fax (520) 623.9797 BiologicalDiversity.org

"touchstone for [the] inquiry" is whether the "selection and discussion of alternatives fosters informed decision-making and informed public participation.")

The scoping notice for the DEIS/DEIR described the project as "either" replacing or rehabilitating the Albion River Bridge, with all three rehabilitation alternatives including earthquake retrofitting. See Appendices at 234. Caltrans must fully consider rehabilitation alternatives in order to provide both the public and decisionmakers a clear basis of choice among options and better protect the local environment and community.

Please contact me if you have any questions.

Sincerely,

Emily Jeffers
Senior Attorney
Center for Biological Diversity
ejeffers@biologicaldiversity.org

Response to Center for Biological Diversity

1. Pursuant to 40 CFR 1502.14 and CCR Title 14 §15126.6, a reasonable range of alternatives was analyzed.

   Alternatives were identified based on past studies and comments received from stakeholders, including regulatory agencies and the community. The resulting alternatives were evaluated and refined through a sequential screening process (preliminary screening and initial screening) to identify the reasonable alternatives that best meet the proposed project's purpose and need, including rehabilitation.

   In accordance with Section 15126.6(c) of the CEQA Guidelines, the factors that may be used to eliminate an alternative from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

4.8 JOCELYN SETO CARTER, ALBION RIVER CAMPGROUND

Cal Trans
Office of Environmental Management
1656 Union Street
Eureka, CA. 95501

Attn: Liza Walker

Dear Ms. Walker,

1

I am one of the owners of Albion River Campground. I attended the community meeting held on August 13, 2024 and was not surprised to learn of CalTrans' position with regard to the replacement of the existing bridge. The EIR was tailored to support its position with all the requisite agencies following suit. This project is going to go forward no matter the bypassing of many environmental mandates and violations of established standards and protocols or how much other valid community objection is put forth. After all, of paramount concern should be for the safety of the community and others who travel that stretch of road. I support this idea. In that spirit, I am impressed with the amount of data supporting CalTrans' opinion that the project will have **minimal** environmental impact on the environment. I do opine, however, that the project will have much more of an impact than CalTrans has stated. CalTrans can only anticipate so much before the project starts; it cannot possibly anticipate what it cannot see or does not want to see. There are years of stuff in "them timbers" and sh—t happens.

2

I was shocked to see that approximately 80% of my property will be taken over for staging. This was not part of the TCE. The speaker said, with great certainty, that the area east of the store can still be used. Really? Who would come to the campground when the road leading to it is inaccessible? Who would come to the campground when there is heavy equipment (however few or infrequent), noise (no matter the decibel or frequency) and toxic fumes (measurable or not)? There would be no campground for the store to exist. It should be noted the roadway leading to the campground (a county road already in need repair) would have to be widened which means removing Eucalyptus trees whose roots are now stabilizing the hillside.

3

Lastly, the greatest potential environmental impact not discussed, as far as I can see, is the weight of all the heavy construction equipment and many diesel engines rolling over my septic tanks and leach fields and other infrastructure potentially 12-14 hrs/day for 3-5 years. The damage could well be irreparable. Think super clean up. Such an occurrence in any shape or form would severely hinder my ability to realize a fair market value for the property or to re-establish it as an RV campground/marina given new regulatory measures pertaining to rising sea levels and prevent the permits necessary to rebuild it. This loss would not only be mine but a loss to the community and those who regularly visit.

4

In the interest of fairness to all interested/invested parties and providing a roadway safe for all manners of movement, I believe the best course of action is for CalTrans to facilitate an independent, third party peer review of the EIR/EIS. The outcome could put many issues to rest and or force more pro-active genuine safeguards to protect the environment, the community and landowners.

Sincerely,

Jocelyn Seto Carter, Member
Sum M. Seto Properties, LLC
Jenny P. Seto Properties, LLC
dba Albion River Campground

September 6, 2024

Response to Jocelyn Seto Carter

1. The document underwent extensive Quality Assurance/ Quality Control (QA/QC) to ensure the environmental document (ED) satisfied all legal requirements in compliance with applicable state and federal laws, regulations and requirements under the California Environmental Quality Act/National Environmental Policy Act (CEQA/NEPA).

   A comprehensive environmental analysis for the proposed project was completed. The ED identifies potentially significant impacts to aesthetics, biological resources, and cultural resources. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level, while impacts to aesthetics and cultural resources would remain significant-and-unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls.

2. The ED states that portions of the Albion Campground would be used for project access and staging under a TCE subject to right of way negotiations, while other Albion Campground facilities may remain open to visitors (at the owner's discretion). All permanent property acquisitions and temporary construction easements would be verified during final design and be negotiated prior to construction. The proposed project would not permanently block public access to the Albion Campground and visitors would have access to the open facilities using Albion River North Side Road, subject to the traffic control described in ED Section 2.2.5, *Common Design Features of the Build Alternatives*. The proposed project has incorporated measures to minimize air quality and noise impacts, including minimizing vehicle delays and idling emissions (see **Standard Measure GHG-4**), dust and trackout controls (see **AMM-AQ-1**), and use of "quiet" air compressors where the technology exists and acoustical shielding around pile driving hammers (see **AMM-NOI-1**).

   The ED identifies that the Albion River North Side Road would be improved (e.g., widened) to allow for better access. The proposed project would install permanent shoring as a necessary safety element to stabilize excavations. In addition, Standard Measure **GS-1** would be implemented, requiring that the project be designed to minimize slope failure, settlement, and erosion and as described in Section 3.3.2, *Water Quality and Stormwater Runoff*, best management practices (BMPs) for erosion control and stormwater discharge would be implemented.

3. The ED notes that any land used as a TCE during construction would be returned to an acceptable condition per the terms of the TCE, including site restoration, prior to the return of that land to the original owner after completion of construction activities (see **AMM-AR-5**). For TCE areas where there are underground facilities, placement of import borrow or base rock may be used to protect underground facilities (i.e., water, sewer, and electrical lines).

4. A third-party peer review of the EIR/EIS is not warranted. The draft ED was circulated for 90 days to solicit comments and feedback on the document as part of the CEQA/NEPA process.

4.9 KEEP BIG SUR WILD

Re: Albion River Bridge Replacement Project

Date: September 7, 2024

albionbridge@dot.ca.gov
hdaca@dot.gov

Attention: Liza Walker, North Region Environmental, 1656 Union Street, Eureka, CA 95501

Dear Members of the Mendocino County Board of Supervisors and Ms. Walker:

1

We, the members of Keep Big Sur Wild, are writing to request that the DEIR is revised to *fully* address the environmentally preferred No-Action (No Build) Alternative, as well as a full analysis of the dismissed Alternative 4 (Rehabilitation Alternative) which would require that regular maintenance and upkeep occurs to the existing historic wooden bridge that currently stands at the Albion River. The current EIR does not fully analyze this viable alternative, and the discussion that dismisses the Rehabilitation alternative up front in the EIR is inadequate to justify its dismissal. Caltrans initially considered rehabilitation and maintenance of this landmark bridge as an alternative in previous years. However, the Purpose and Need stated in the EIR precludes consideration of this alternative and is much too narrow to allow for a robust environmental review to keep the bridge in place. The preparation of a Purpose and Need that is too narrow is not allowed under CEQA regulations, because it does not allow for the full consideration of a range of reasonable alternatives. The No Action/No Build/Rehabilitation alternatives should all receive full analysis in a supplemental section of the DEIR before any decision is considered by CALTRANs.

A history of working together to preserve important historic resources

Why is a group from Big Sur writing to support the preservation of the Albion Bridge? It's because Keep Big sur Wild has been deeply aligned with the Albion Bridge Stewards, who came to Big Sur's aid when the historic bridge rails for six of the bridges on Highway 1 were threatened with modernization by CALTRANs. We are aligned across the State to ensure that our historic bridges are not threatened with unnecessary modernization. At the local level here

in Big Sur, the decision-makers in Monterey County recognized the importance of preserving the beauty and historic character of the bridges in Big Sur, both at the Planning Commission and Board of Supervisors levels. Along the way to these unanimous decisions to deny CALTRANs, there were literal and figurative roadblocks put up by CALTRANs. CALTRANs consistently presented false pictures of the "safety" issues the historic bridges presented, when in fact the data showed that in over 90 years, there were no fatalities on any of these bridges. They also claimed that they were not repairable, although Keep Big Sur Wild and others repeatedly showed examples of CALTRANs quickly and easily repairing the historic bridge rails when they were damaged by minor accidents.

We raise the issue of the alignment with the Albion Bridge Stewards because the importance of preserving our historic bridges cannot be overstated. The beautiful wooden bridge in Albion deserves to be honored and preserved, especially since it is a designated historic landmark. Over the years, the Albion Bridge Stewards have diligently worked to protect this community icon, even securing its place on the National Register of Historic Places and the California Register of Historic Resources. These issues don't only affect the community around the landmark, it affects all the visitors to the Albion and Mendicino area. This area is known for its history and is visited by the international community, who all value the features that make this area special, which includes the national treasure of the wooden trestle bridge at Albion, the last of its kind in California.

The No Action (No Build) Alternative and the Rehabilitation Alternative (Dismissed Alternative 4) must receive a full analysis as viable alternatives in the DEIR

It has come to our attention that CALTRANs had previously discussed an alternative as recently as **May 5, 2022** (during the virtual online scoping meeting) to rehabilitate the bridge. However, by July 2024, Caltrans narrowed the proposed project to only consider total replacement, although rehabilitation and maintenance remains a completely viable and reasonable alternative. To destroy an historic resource simply to widen it to allow for bicycle and pedestrian access by calling it "functionally obsolete" flies in the face of its designation as an historic landmark. More analysis on the viability of the preservation of the existing bridge as the "No Action (No Build)" alternative or the reconsideration of the Rehabilitation alternative must be completed.

The Purpose and Need for the project as stated in the DEIR is too narrow and backs into a project that would require the bridge's destruction. The DEIR's purpose and need states:

"The purpose of this project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The project is needed to address several critical deficiencies associated with the existing bridge. Correcting these deficiencies would improve safety for all users and reduce the chance of catastrophic bridge failure. The purpose of the project is to provide a bridge across the Albion River that meets *modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs.*" (*emphasis added*)

2

The DEIR states that the bridge has "an external wooden barrier rail incapable of resisting current vehicle impact loading requirements." If the railings need to be replaced (while keeping the historic wooden portion below the barrier rail in place), they should be replaced with a design that honors the historic character of the existing bridge. If the bridge needs to be seismically retrofitted, this cost analysis must be included in the DEIR, along with maintenance costs. Then the DEIR should compare the costs to tear down and construct a new bridge (an estimated $130,000,000+) with the costs of seismic retrofit and the ongoing maintenance costs. In addition to the sheer cost of the bridge replacement and removal, the ancillary impacts resulting from the bridge removal would be significant.

3

The DEIR website also states that "the bridge is fracture-critical due to the riveted steel deck truss main span's lack of redundancy. If key structural connections or components are compromised, the bridge could fail during a seismic event or under heavy cyclical loads". This also implies that currently, the key structural connections or components are NOT compromised, only that they have the potential to do so in the future. With careful evaluation and retrofit, these elements can be shored up to preclude a failure and fractures on the bridge.

4

5

The failure of the environmental document to adequately document the purpose and need is evident. What are the critical deficiencies of this bridge? Two engineers have independently evaluated the bridge and determined that it can be repaired and maintained, and that it can bear weight loads. Caltrans often describes the Albion bridge as "functionally obsolete"—which simply means that the bridge doesn't meet today's design standards for shoulder width and pedestrian and bicycle lanes, however, it is our understanding that a cantilevered path for pedestrians & bicycles can be added to the existing bridge. There are tens of thousands of "functionally obsolete" bridges in the country, including the Golden Gate Bridge and most Highway 1 bridges. Yet these bridges are safe, and *there is no legal requirement to replace them*. The Bixby Creek Bridge on Highway 1 in Big Sur is also a registered historic landmark. It, too, is "functionally obsolete,"and in the 1990s, Caltrans spent more than $20 million to retrofit and preserve the bridge.

6

CALTRANs' DEIR states that "The bridge requires ongoing preventative maintenance. Caltrans anticipates a continuous program to paint the steel deck truss approximately every 5 years and to replace timber fasteners, the bolted connections, and hardware throughout the entire timber substructure approximately every 2 years." ***This preventative maintenance description implies that the bridge is salvagable, and points to the fact that with regularly scheduled upkeep and care, the bridge will continue to function as it stands.***

> CALTRANs states that "Under the No-Build Alternative, the proposed project would not occur, and the existing bridge would remain in its current condition. The existing bridge would continue to deteriorate and become increasingly *susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami.* Given the deteriorating condition of the existing bridge, extensive recurring maintenance, and structural improvement projects to maintain the bridge are being implemented currently or are anticipated. Decay and corrosion are expected to continue at an increased rate over time."

These projections do not make the case for a total replacement; rather they are predictions of a future scenario that could be proactively addressed with careful maintenance and care of the bridge.

The bridge is not in need of immediate or near-term replacement. The bridge is in remarkably good condition, thanks to its well-conceived structural design, high-quality timber materials, and effective connection detailing. While there certainly are locations on the bridge that require maintenance and repair, overall the bridge appears structurally sound and safe for continued use, as per the "Safe Load Capacity and Ratings" reflected in Caltrans' January 5, 2018 Bridge Inspection Report. In 2018, two world-class professional engineers, Ben Brungraber, Ph.D. and Dick Schmidt, Ph.D, assessed the Albion River Bridge and concluded that it was "safe for continued use" and "in remarkably good condition." The Albion River Bridge is not posted with any load capacity/weight limits. The design of the bridge involves a highly redundant structural system with multiple load paths. Features of the design (from the 2018 assessment) that lead to its robust and resilient character include the following:

- The timber members are of uniformly high-quality Douglas fir salt-treated by the Wolman method.

- The timber trusses of the superstructure and support trestles consist of members primarily subjected to axial compression forces, for which heavy timber members are well suited.
- The dimensional integrity of the bents in the trestles is impressive. Column lines are straight (to the eye) and the bents are planar.
- The battered columns provide a base that is wider than the bridge deck, thus enhancing the ability of the bridge to resist lateral loads, such as those from wind.
- In August 2002, a loaded logging truck plunged down the side of a trestle, destroying the cross-bracing members between bents. The fact that the trestle did not collapse due to the loss of bracing is an indication of the resilient and redundant nature of the trestles and demonstrates how the internal shear connectors might be revealed for inspection (as discussed later in this report) without endangering the structural integrity or safety of the bridge.
- There is little or no audible rattle below the bridge deck when traffic passes overhead. This observation suggests that connections are tight and members are sound.
- Generally, access to the connections within the trestles is good, which will enhance the efficiency of inspection, maintenance, and repair activities. Removing bracing members temporarily to inspect the inner connection hardware could be performed relatively easily without requiring closure of the bridge to traffic.
- Each of the outer-most columns of each bent is heavily bolstered at its base to help distribute compressive load into side-grain bearing on the lower sill plates. The next, inboard line of columns is lightly bolstered, because those columns carry less compression under lateral load. The bolsters appear to be effective in controlling overstress of the sill plates, as we observed no indications of localized crushing due to compression perpendicular to grain.
- Many of the large timber members have checks – radial cracks on the surface of the timber. The checks tend to be aligned with the longitudinal axes of the members, which suggests that the members have remarkably straight grain, another indication of high-quality material. Checks are not generally regarded as strength-reducing defects and do not require repair. Checks on the sides or bottoms of horizontal members and on any face over vertical or diagonally oriented members are able to drain freely when subjected to rain water.
- The bridge deck consists of two crossing diagonal layers of timber planks. The upper layer uses tongue and groove planks that lock together and provide uniform support for the asphalt pavement. The lower layer has planks that are spaced to minimize trapping any water that might migrate through the asphalt wearing course and the upper layer.

The two layers of planks, properly coupled to the longitudinal stringers along the edges of the deck, have the potential to form an effective diaphragm (a deep, flat beam) to resist out-of-plane loading. With proper drainage detailing, the bridge deck also acts as a roof to protect the superstructure and trestle towers from stormwater runoff.

- Concrete piers supporting the timber trestles are in good condition. We observed no spalling or cracking. The piers provide uniform bearing support for the sill beams of the trestles.

The conclusions of the above-referenced study must be included in the EIR, and gives further credence to the full consideration of the No-Build and Rehabilitation alternatives. The DEIR acknowledges that "The bridge is the sole crossing over the Albion River along SR 1 and is an important route for tourism and intraregional travel along the Mendocino Coast."

Other impacts of Bridge Removal

7

Biological Resources: The Albion River is a waterway of national significance and a Wild and Scenic river, supporting myriad species of wildlife and important vegetation that supports the health of the river and the species that inhabit it. The proposed project (bridge replacement) would dewater the river for many years, most likely longer, and the impacts to wildlife would be significant. The dewatering impacts on the Albion Flat hyporheic zone (a critical component of the Albion River juvenile salmon/steelhead estuarine system) would be significant and avoidable with the No-Build alternative.

8

Geology/Soils: It has come to our attention that the DEIR/S omits Caltrans' geotechnical study report from the 2018-19 investigation; Albion River and Albion Cove bluff slopes have a history of instability; proposed bluff stabilization is not the least environmentally damaging and environmentally preferred alternative.

9

Other impacts: Aside from the aesthetic changes, the destruction of the historic bridge would create significant noise, recreational, land use, and historic/cultural resources impacts that can be avoided simply by preserving the historic bridge and the No-Build/Rehabilitation alternatives.

The importance of this historic resource must also be considered, and there is no cost evaluation that can address the permanent loss of it. The Albion River Bridge is not just a critical piece of infrastructure; it is a unique and irreplaceable historical landmark that represents an important chapter in California's history. As the last tall wooden highway bridge in the state, its preservation should be a priority, not only for the residents of Albion but for all Californians who value our shared cultural heritage.

10

This is the overarching issue that looms over the entire project. It is clear that the community cherishes the bridge, and the Albion Bridge Stewards are a group of committed individuals who do not get paid for their time and energy spent over the last several years to try and preserve the bridge at Albion. Their continued commitment is a testament to how much this beloved bridge means to them. They have nothing to gain from an economic perspective; it is simply a love of place and history that joins them together in this effort. We stand with them in this mission.

Sincerely,
Christina McGinnis
Via email

On behalf of Keep Big Sur Wild
A non-profit 501c3
KeepBigSurWild.org

Response to Keep Big Sur Wild

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations, and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/ Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   The Environmentally Superior Alternative is identified in the ED as Design Option 2B (East Arch). See ED Section 2.3.1, *Environmentally Superior Alternative*. This design option has been identified as the preferred alternative (see ED Section 2.4, *Identification of a Preferred Alternative)*.

   Developed in accordance with 40 CFR 1502.13 and 14 CCR 151.24(b), the ED identifies a purpose, need, and project objectives, and analyzes a reasonable range of alternatives. The purpose of the proposed project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in ED Section 1.4, *Purpose and Need*.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   Under the No-Build Alternative, the proposed project would not occur, and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, seismic events, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative also does not meet the proposed project's purpose and need. See ED Section 2.2.1, *No-Build (No Action) Alternative*.

2. The bridge is bordered on each side by two 4-inch-wide wooden bridge rails atop the bridge deck. The bridge rails are not capable of resisting current safety impact loading requirements and need to be replaced. Caltrans requires compliance with current bridge rail design standards when a structure is rehabilitated or replaced.

   There is no standard bridge rail available that could connect to the existing bridge's timber deck without exceeding the design load of the bridge deck. Failure to address the need for a standard bridge rail that meets current safety

impact loading requirements is one of the many project objectives that the rehabilitation options fail to satisfy.

3. The existing bridge's main span lacks redundancy in its design and would be incapable of carrying loads across the bridge if there were to be damage to one or more of its steel members. Due to this lack of redundancy, the bridge is designated fracture critical. There is added risk and uncertainty to keeping a fracture critical bridge in service, even if it is extensively rehabilitated. If a fracture critical component were to fail, it could cause the bridge to collapse.

   The rehabilitation options would replace the main span with a manufactured steel deck truss of the same dimensions; however, the manufactured steel deck truss would not allow for redundancy in the design. Therefore, the bridge would remain fracture critical.

   Failure to eliminate the fracture critical condition of the truss main span is one of the many project objectives that the rehabilitation alternatives fail to satisfy.

4. The purpose of the proposed project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives, as well as detail regarding the existing bridge's deficiencies, are further described in Section 1.4, *Purpose and Need*.

5. The addition of a cantilevered walkway to the existing bridge to provide pedestrian access is not a viable option as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further. considered. However, a Rehabilitation with Widening option involving wider shoulders was considered. Although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

6. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The No-Build Alternative and rehabilitation options fail to address the project need. As stated in Appendix I, *Consideration of Rehabilitation Alternative*, FHWA summarized the need for bridge replacement in its 2021 Bridge Inspection Program Annual Review as it "is evident that Caltrans has been prudent at keeping this bridge in service beyond its expected years. It will require more resources to inspect, repair, and eventually reduce the level of serving the transportation needs of SR 1. All the reasons for the replacement of this bridge is at hand and the need to quickly replace this high-risk structure on this important coastal route is prudent".

7. Cofferdams would be constructed around piers, where necessary, to isolate work from the active river channel and groundwater infiltration. The cofferdams would be dewatered to create a dry work zone for construction of the replacement bridge and removal of the existing bridge. These activities could result in a temporary drawdown in groundwater, which could temporarily disrupt or alter baseflow in the immediate area. Because this work would be temporary in nature and only performed during construction, the groundwater baseflow and quality would return to pre-construction conditions once the dewatering activities are completed.

   A comprehensive environmental analysis was completed for the proposed project. The ED identifies measures to avoid and minimize environmental impacts throughout various sections, including measures for impacts to biological resources. Further, under CEQA, mitigation measures were identified for potentially significant impacts to certain biological resources. See Appendix D*, Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. See Master Response 13 (Environment) for more information on effects to environmental resources.

8. All Build Alternatives would install permanent shoring as a necessary safety element to stabilize excavations for equipment and worker access along the steep slopes around the new bridge foundations. In addition, the proposed project would be designed to minimize slope failure, settlement, and erosion, and new earthen slopes would be vegetated to reduce erosion potential (see Standard Measure **GS-1**). One of the criteria used to identify the preferred alternative was the landform change associated with bridge construction and stability of the northwest bluff. The identified preferred alternative (Design Option 2B – East Arch) has the least amount of landform change and does not propose construction on the northwest bluff.

9. A comprehensive environmental analysis for the proposed project was completed. The ED identifies that impacts to noise, recreation, and land use would be less than significant, and impacts to aesthetics and cultural resources would be significant and unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The No-Build Alternative and rehabilitation options fail to address the project need. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, including impacts associated with rehabilitation activities, see Master Response 1 (Rehabilitation).

10. Comment noted.

4.10 MARY BOBBITT AND JUL NIEMIER, TIDES TURN VACATION HOME

From: Jul Niemier
To: albionbridge@DOT
Subject: Albion River Bridge
Date: Monday, September 9, 2024 3:29:26 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1 I am writing to express my concerns regarding the significant, unmitigated noise impact associated with the proposed Albion River Bridge Replacement Project. The Noise Study Report indicates that construction activities will produce significant noise levels, potentially disturbing residents and visitors as well as avian, terrestrial, and aquatic wildlife (Noise Study Report, p. 20-24).

2 As a local business owner who is deeply concerned about the potential impact of the Albion River Bridge Replacement Project "build alternatives" on my business and my customers. The construction of a new bridge would undoubtedly lead to significant disruptions in traffic flow, detours, and access issues that would severely affect my business operations and my customers' ability to reach my establishment, let alone the quiet enjoyment of our beautiful scenic Albion.

3 The Community Impact Assessment has highlighted that construction could restrict access to key areas, including local businesses, for an extended period that by further analysis of the Draft EIR/EIS and its attachments will extend to 4 to 6 years (Community Impact Assessment, p. 14-17). This disruption would result in a decrease in customer traffic, loss of revenue, and long-term harm to the local economy, which relies heavily on both residents and tourists who travel across the Albion River Bridge.

4 Instead of pursuing a new bridge, I urge the project team to focus on rehabilitating and maintaining the existing historic Albion River Bridge. Rehabilitation would be less disruptive, allowing for phased construction that maintains traffic flow and business access. By preserving the existing bridge, we can protect not only its historical value but also the economic vitality of local businesses that depend on it.

Thank you for considering the serious impact that bridge construction, noise and disruption would have on local businesses like mine. I strongly encourage you to prioritize the rehabilitation and preserving the existing historic Albion River Bridge. This approach would not only substantially reduce noise pollution but also preserve an important historical structure that is listed on the National Register of Historic Places. Rehabilitation would be less intrusive and environmentally damaging, and it honors the bridge's cultural significance which my customers enjoy.

Thank you for considering this alternative approach.

Sincerely,

Mary Bobbitt

Jul Niemier

Tides Turn Vacation Home.

Response to Mary Bobbit and Jul Niemier

1. The referenced pages of the Noise Study Report (NSR) identify the existing noise environment and summarize the results of short-term and long-term noise measurements taken from locations surrounding the project (p. 20 – 22) and identify the predicted future noise environment following construction (p. 23 – 24). The referenced pages of the NSR do not contain predicted noise levels during construction. If the comment intended to reference pages 30 – 34 of the NSR (Chapter 8 – Construction Noise), this chapter includes a worst-case assessment of potential noise impacts during construction. The NSR and the ED identify that the loudest noise-generating construction activity, pile driving, would generate an anticipated maximum outdoor noise level of 94 dBA Lmax at residences approximately 115 feet from impact pile driving.
2. Pile driving would only be required for specific activities, such as construction of temporary trestles and new bridge foundations and would occur during daytime hours over short durations with breaks in between each pile. Pile driving would not be ongoing throughout the length of construction. In addition, the project would implement minimization measures to reduce noise impacts, including providing acoustic shielding around pile driving hammers and implementing additional noise controls when operating outside typical hours (see **AMM-NOI-1).** The project would not have significant noise impacts under CEQA (see ED Section 4.3.13, *Noise*).

   Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings (e.g., businesses) within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional details regarding traffic impacts, see Master Responses 7 (Traffic and Emergency Response).

3. The Community Impact Assessment identifies a three-to-five-year construction period, depending on the alternative selected. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

4. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation*

Alternative. For additional details regarding bridge rehabilitation, including impacts associated with rehabilitation activities, see Master Response 1 (Rehabilitation).

4.11 SIERRA CLUB 1

SIERRA CLUB
FOUNDED 1892

Sierra Club, Mendocino Group
P.O. Box 522
Mendocino, CA 95460

August 30, 2024

Caltrans
Attention: Liza Walker,
Office of Environmental Management
1656 Union Street
Eureka, CA 95501

(albionbridge@dot.ca.gov)

cc: Shawn Oliver
Abbie Strickland, CCC
Julianne Polanco, SHPO
Karyn Gear, SCC

re: Caltrans Albion River Bridge Project DEIR/DEIS and Section 4(F) Evaluation and Draft Section 4(f) Evaluation

Dear Ms. Walker,

We appreciate the opportunity to comment on the DEIR/DEIS for the Albion River Bridge Rehabilitation or Replacement Project.
The Sierra Club Mendocino Group (SCMG) has many concerns about the project, several of which are covered in comments by the Albion Bridge Stewards and individuals. Consequently we will only comment on the ones that appear to be of special concern to our group.

The primary request is for a Supplemental EIR/EIS that addresses the subjects below:

1. Consideration of Alternative 4B Rehabilitate and Widen Existing Bridge

1

Alternative 4, (Rehabilitation Alternative) was the obvious preference of most of the responders at the scoping meetings, with several long-term residents making impassioned statements of the value of the Bridge to

1

the Albion Community. Neither this nor any other community value is mentioned in the Purposes of the project. In fact, all of the Purposes are only those that serve the need of Caltrans, showing no respect for the values of the community and the coastal environment. Therefore, it was easy to dismiss Alternative 4 as not meeting the Purposes. There are no studies or tests delivered that support this decision, just simple statements.
The "several critical deficiencies" of the current bridge have been questioned by timber bridge experts and shown to be correctable with rehabilitation, maintenance and preservation actions, combined with addition of seismic retrofits, improved railings, and pedestrian/bicycle trail canti-levered to the west.

2

The State of California, with enactment of SB 1 in 2017, also required Caltrans to prioritize repair and maintenance of all bridge assets in the State highway system - and provided substantial funding for that priority.

After the 2014 meetings, The Press Democrat reported that

> "Abolhassan Astaneh-Asl, a UC Berkeley civil and environmental engineering professor who specializes in studying structural damage from earthquakes and terrorist bombings, evaluated Caltrans' studies. …Astaneh-Asl largely rebutted the need to replace the Albion River and Salmon Creek bridges…. He said the bridge was well-designed, of historical significance, in better shape than many other bridges in the state and worthy of saving. Caltrans officials will respond to Astaneh-Asl's statements, along with other public comments, in the bridge project's environmental impact report, Frisbie said."

Yet, the Appendix I does not mention Mr. Astaneh-Asl's report or directly answer the issues therein. The Caltrans Bridge Inspection Reports indicate that Caltrans has deferred maintenance over the years since and now claims that the bridge is dangerous. If these issues were rigorously investigated we would like to see the methodology, reports and data that Caltrans engineers produced.

3

The Sierra Club Mendocino Group therefore requests that the Supplemental EIR/EIS includes a reestablishment of the Alternative4

with full consideration of the possibility of maintaining and preserving the Nationally Registered Historic Albion River Bridge, with environmentally sustainable and historic Bridge-compatible improvements.

2. Preservation of the National Registered Historic Bridge

4

We notice that in the DEIR/DEIS Chapters 3 & 4 there is no category for Preservation of Historic Resources. The destruction of the Bridge is mentioned in the Visual Impacts section only to evaluate viewing the Albion River Bridge as compared to viewing the proposed bridge. This gives weight to the visual, but no weight to the historic value. In essence it is proclaiming that history itself has no value. This is contrary to the state and federal mandate to protect historic places and structures. The current bridge is in fact the only remaining example of timber highway bridges anywhere along the coast of California. Is there really no loss in tearing down the last example of a historic building technique that relates directly to the timber logging industry on the coast? Albion had the first sawmill and exports of redwoods, and that history is being lost as all the reminders are destroyed. Caltrans is obliged to protect, not eliminate, historic sites.

Chapter 3.2.11 Cultural Resources does mention the Bridge as a Nationally Registered Historic Place, but spends most of the chapter on the archaeological resources, not historic. At the end it states, "the Albion River Bridge would be completely removed under all Build Alternatives. As such Caltrans has determined that the project would have an adverse effect on this historic property by removing the bridge in its entirely and therefore its characteristics that qualify it for the National Register." Again there is no value analysis or acknowledgement that the historic meaning of the bridge had significant local, regional, national and international value.

Especially dismaying is the section on Community Character and Cultural Resources that dismisses the destruction of the significant historic Albion River Bridge with the simplistic statement that "Losing the existing bridge would impact community character."

3

The existing bridge is the elephant in this room and deserves much more respect and attention than is evident in this report. Its preservation is the foremost issue in the challenge to Caltrans plans because it's destruction would change the experience of living in Albion or traveling to Albion in severely negative ways. The community speaks out on this at every opportunity, yet Caltrans turns a deaf ear. It seems like Caltrans encourages us to speak out only so it can ignore our demands.

The Bridge will be the subject of negotiations between Caltrans and the State Office of Historic Preservation and the Sierra Club requests a more nuanced statement of support for protecting the bridge, as well as the required full analysis of the historic bridge preservation potential .

The Sierra Club Mendocino Group requests that the Supplemental EIR/EIS includes a historical valuation of the importance of the Albion River Bridge in relation to the logging, agricultural, settlement and transportation, including pedestrian access to and along the lower Albion River and the Albion Cove beach, during he last 170-plus years.

5

It is essential that the Supplemental EIR/EIS includes a description and details of the conferences with the OSP and discussion of the alternatives to demolition. The Sierra Club Mendocino Group also requests Caltrans to include us as a formal stakeholder participant in Caltrans-State Office of Historic Preservation activities regarding the historic Albion River Bridge.

3. Establishment of public access to a navigable Wild & Scenic Albion River and the Pacific Ocean shoreline.

6

We find the Caltrans access report to be insufficient and minimalist rather than a "thorough investigation" or "full consideration" of the possibility of public access. It is only a listing of the problems, not any forward-looking plans. The enclosed maps have no scale or legends and there is no mention that the County owns property on the south bank, nor that there is prescriptive access to the millpond and the valley floor mentioned in Use Permits from 1977-1993.

Albion River and Albion Cove are among the important harbors of refuge for boats and the single-most important public access point to and along the Mendocino coast between Navarro River and Van Damme State Beach, yet it has no no-cost public access to the river or shoreline. It has long been a goal of the Sierra Club to gain access to the shoreline under the bridge including parking. This is now strongly restricted by the lack of county road and parking, and resistance and intimidation by the campground managers. This has been an on-going problem for the residents and visitors for many years, and this huge construction project has the capacity to help solve it for future generations.

The Alternatives considered in the DEIR/DEIS would be making major changes in the roads, landforms, and valley floor; would be potentially destroying the one unique Registered Historic Timber Bridge along Hwy 1; and would be giving hundreds of thousands of dollars in rent to the one landowner without making any contribution to the Albion Community. All access to the river and shoreline will be closed for 3-5 years with no proposed mitigation.
Potential public access was dismissed with the simplistic "It is not practical to construct new public access routes and/or facilities to Albion River within the existing and proposed State right of way as part of the replacement bridge project." This omits the obvious fact that it is Caltrans that sets the "proposed" State Right of Way.

It's time to stop describing what you can't do and envision what you <u>can</u> do for us. This situation calls for bold action.

Caltrans acknowledges that it will be expanding the Right of Way to at least 100 feet wide and utilizing the valley floor for equipment and transport. Since this involves buying property from the landowner, it is an opportunity to buy enough to establish public access parking by the bridge and a driving easement from it to the County Road #403, open sunrise to sunset. A self-propelled boat ramp already exists just upstream from the bridge. Examples are Fort Bragg's Noyo Bridge and Russian Gulch Bridge in Mendocino. It would be a considerable investment now, but an enduring benefit to the public.

In the response to the original NOP the CA Coastal Commission (Gedik 2015) points out the relevant Coastal Act and Mendocino County Local

5

Coastal Plan policies (see below)* and "Caltrans should address options for providing maximum public access possibilities..." (Emphasis added). " Additionally, the NOP acknowledges that the proposed bridge rehabilitation and /or reconstruction would result in impacts to public access to and along the coast, including but not limited to temporary closure of some or all of the Albion River Campground, lane closures, and traffic delays. The environmental analysis should include a thorough investigation of the short- and long-term impacts to public access and recreation opportunities and identify measures to avoid, minimize, and mitigate for impacts to public access and recreation."

The Mendocino County Local Coastal Plan Policy 4.0-7 specifically states:

> "No cost access and parking area should be acquired to both the north and south side of the Albion River in accordance with Policy 3.6-5

State Lands Commission stated that

> "During the design hearing process and prior to CSLC consideration of a project, Caltrans is required to give "full consideration of, and a report on, the feasibility of providing a means of public access to the navigable river for recreation purposes."*1
>
> In addition, the Commission may require an independent evaluation of routing proposals by specialists.
> " The EIR should discuss the recreational uses and access points in the Project vicinity, and what, if any, measures could be implemented to reduce the impacts."

The California Streets & Highway Code Section 84.5 requires and evaluation of the feasibility of providing public access to the Albion River, including:

> An assessment of public access needs at the project location, in addition to a benefit analysis of public access alternatives.
> An assessment of existing constraint and hazards that could make on-site public access infeasible.
> A feasibility assessment of proposed on-site public access infrastructure...

6

These were either dismissed or minimized without the required analysis. We suggest that rather than trying to ignore the various agency supports for public access and state only the reasons "why not", Caltrans take an affirmative approach to fulfilling the mandates for public access to the river and shoreline. Caltrans can do a lot more to improve the community than just tear down the one unique historic and visual resource. The shoreline was open until 1977 and should be again.

The Sierra Club Mendocino Group therefore requests that the Supplemental EIR/EIS includes a historical and current valuation of the public interest in access to the river and shoreline, and the potential to provide maximum public access.

4. Protection of the Albion River North Bank Road and bluff.

7

We also have questions concerning the evaluations of the appurtenant roads to the project. The North Bank Albion River Road (County road 403) is indicated as an access road for equipment, but was not fully included in the biological and geologic reports, or in the diagrams showing the staging areas or haul roads. The bluff above the road will be impacted as well as the lower sidehill.
This access road has been a problem for the community for many years, and has historically had several alignments. The slope of the north bank exceeds 75% and has only been navigable by using a very sharp hairpin turn at the east, often involving backing up long truck/trailer rigs. We wonder how this road could be configured to a two-way road large enough for equipment trucks to pass. It seems that the roadbed and the hairpin turn would have to be widened considerably and the radius increased. Yet there is no plan stated for making these changes, as well as connecting it to the Albion-Little River Road, without impacting the biological resources. Landslides into the Albion Flats property would be a real possibility with the removal of trees both above and below the roadway. The backyards of the residential parcels may also have to be cut to accommodate a larger road. Any of the Alternatives would use this road.

Mendocino County Local Coastal Plan
Section 3.5 - Visual Resources, Special Communities
3.5 VISUAL RESOURCES, SPECIAL COMMUNITIES AND

7

ARCHAEOLOGICAL RESOURCES
Coastal Act Requirements
Protection of visual resources is a specific mandate of the Coastal Act:

30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas to minimize alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

We request that Caltrans increase the area of the geologic and biological surveys and include the plans for widening and reconfiguring the North Bank Albion River Road in a supplemental EIR.

Rixanne Wehren

Rixanne Wehren
Coastal Committee Chair
Sierra Club, Mendocino Group
PO Box 522, Mendocino, CA
707-937-2709 land
707-357-2709 cell

REFERENCES:

State Land Commission letter, May 7, 2015
Section 84.5 of the California Streets and Highway Code states:
"During the design hearing process relating to state highway projects that include the construction by the department of a new bridge across a navigable river, there shall be included full consideration of, and a

report on, the feasibility of providing a means of public access to the navigable river for public recreational purposes."

CA St & Hwy Code § 85 (2023)
In order to provide the commission with an independent evaluation of routing proposals as the (State Lands Commission) may desire from time to time, the commission may contract with specialists, including, but not limited to, persons trained and experienced in engineering, economics, landscape and design architecture, fish and wildlife management, park and recreation management, history and sociology, agriculture, and urban and regional planning. The commission is authorized to expend any funds in the State Highway Account to carry out the provisions of this section.

National Register of Historic Places
Distinct Characteristics of Type

The Albion River Bridge is the only remaining timber deck superstructure over steel and timber truss on concrete and timber bent trestle substructure bridge in the California highway system. This rare example of transportation engineering history can still be experienced today exactly as it was built, 73 years ago. It was constructed during WWII, 25 years after its primary structural design elements of steel and timber were set aside by the Department of Transportation in favor of reinforced concrete beams and arches. It is a lasting tribute to the ingenuity and talents of the engineers and contractors who built it, and an important link in the history of bridge design in the State of California. Crossing this bridge along California's scenic coastal Highway 1 is a most thrilling experience. East and West vistas are enhanced by the steady tempo of her timber rail enriching this delightful visual symphony that is the Albion River Bridge.

Cc:
Federal Highway Administration – California Division
Attn: Shawn Oliver, Env. Program Manager
650 Capitol Mall, Suite 4-100
Sacramento. CA 95814-4708

9

California Coastal Commission – North District Office
Attn: Abbie Strickland
1385 Eighth Street
Arcata, CA 95521

CA Office of Historic Preservation
Attn.: Julianne Polanco
State Historic Preservation Officer
PO Box 942896
Scaramento, CA 94296

CA State Coastal Conservancy
Attn: Karyn Gear
1515 Clay St. 10th Floor
Oakand, CA 94612

Coastwalk
321 South Main St #520
Sebastopol, California 95472

10

Response to the Sierra Club

1. Developed in accordance with 40 CFR 1502.13 and 14 CCR 151.24(b), the environmental document (ED) identifies a purpose, need, and project objectives, and analyzes a reasonable range of alternatives. The purpose of the proposed project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in ED Section 1.4, *Purpose and Need*.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as a 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   Although the bridge inspection reports do not characterize the existing bridge as "dangerous", they do document the bridge's functional, safety, and structural deficiencies that would be addressed by the proposed project.

3. For a discussion of the rehabilitation options, see Response to 1 above.

4. The ED describes and discusses historic resources in Chapters 3 and 4 under the sections titled "Cultural Resources", as well as in Appendix A, *Section 4(f)*. Section 4.3.5 in Chapter 4 acknowledges that the existing bridge is listed in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR), and that the bridge would be directly impacted by the proposed project. The ED determines that removal of the existing bridge would result in a significant and unavoidable impact to cultural resources under CEQA, even with the implementation of mitigation (**AMM-CR-3**). This final EIR/EIS has been prepared pursuant to CEQA and NEPA.

5. The Sierra Club is acknowledged as a consulting party pursuant to NHPA Section 106 and has been included in consultation pursuant to Section 106.

   For a summary of coordination efforts with the agencies and general public, see Chapter 5, *Comments and Coordination*.

6. Impacts to recreation were fully analyzed in the ED and were determined to be less-than-significant under CEQA; therefore, no mitigation is required.

With respect to access during construction, the proposed project would not permanently block public access to the Albion Campground and, pending right of way negotiations, certain Albion Campground facilities may remain open to visitors (at the owner's discretion). Visitors would be able to use the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives*, or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction).

With respect to existing public access and potential for future improved public access, a Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. The report included maps with a scale bar, and features are called out rather than using a legend.

The Public Access Feasibility Report, referenced and incorporated into the ED, identify that there is no deeded public access to the Albion River or the beach (see ED Section 3.2.5, *Parks and Recreational Facilities)*. The public can access the Albion River through the privately-owned Albion Campground with a day pass or reservation of a campsite for a fee. In addition, in 2024, the Albion River Campground website indicated that the general public was welcome to access the beach without charge during normal day-use hours if they do not park on private campground property and do not use the facilities. The other private access point, Schooner's Landing Marina, has previously provided river access, but is currently closed. On the south side of the river, self-propelled personal watercraft can be launched from a facility owned by Pacific Union College for a fee. Many access points along the coast require a fee for public access, and fees are similar to the entry fee for the California State Parks in the vicinity, such as Russian Gulch State Park.

While there are county roads north and south of the Albion River (Albion River North Side Road, Albion River South Side Road), there are no county properties on the north or south bank of the Albion River in the area. The State right of way (ROW) along the existing highway includes 50 feet on either side of the existing bridge centerline, for a total of 100 feet (see *Right of Way Acquisitions* in ED Section 2.2.5, *Common Design Features of the Build Alternative*). The permanent ROW to be acquired is what is necessary for operational and maintenance needs of the highway. See ED Section 2.2.6, *Unique Features of Build Alternatives* and ED Section 3.2.7, *Relocations and Real Property Acquisition*, for a discussion of ROW acquisition, as well as associated tables and maps. As noted in the Public Access Feasibility Report, public access must be constructed within the state ROW and be compliant with the Americans with Disabilities Act (ADA). As the south bank/bluff slope and north slopes are steep, it would be impractical to provide access that is compliant with the ADA within the state ROW. However, the proposed project would provide a structure with a 75-year service life as well as widened shoulders and a pedestrian path, which would ensure safe and reliable coastal access near the Albion River. Further, the project proposes to improve Albion River North Side Road,

which connects SR 1 to the Albion Campground, by widening and realigning the road. These changes would improve public safety and accessibility to the Albion Campground.

For additional details regarding public access, see Master Response 4 (New Public Access).

7. The ED identifies that the Albion River North Side Road would be improved (e.g., widened) to allow for better access; the existing roadway and anticipated improvements were included in the proposed project's Environmental Study Limits (see Figure 3 in Section 2.1, *Project Description*). The Environmental Study Limits encompass the entire area of project activities.

   The proposed project would install permanent shoring as a necessary safety element to stabilize excavations. In addition, Standard Measure **GS-1** would be implemented, requiring that the project be designed to minimize slope failure, settlement, and erosion and as described in Section 3.3.2, *Water Quality and Stormwater Runoff*, best management practices (BMPs) for erosion control and stormwater discharge would be implemented. Further, a project-specific Revegetation Plan would be implemented that utilizes regionally appropriate native plants (see **AMM-AR-4**).

4.12 SIERRA CLUB 2

SIERRA CLUB
FOUNDED 1892

Sierra Club, Mendocino Group
P.O. Box 522
Mendocino, CA 95460

October 8, 2024

Caltrans
Attention: Liza Walker,
Office of Environmental Management
1656 Union Street
Eureka, CA 95501

(albionbridge@dot.ca.gov)

cc: Shawn Oliver
Abbie Strickland, CCC
(c/o aurora.robinson@coastal.ca.gov)
Julianne Polanco, SHPO
(julianne.polanco@parks.ca.gov)
Ms. Elissa Konove, US FHWA, Sacramento
(Elissa.Konove@dot.gov)
Karyn Gear, SCC
(Karyn.Gear@scc.ca.gov)
Beverly Terry, CSLC Public Land Management Specialist

re: Caltrans Albion River Bridge Project DEIR/DEIS and Section 4(F) Evaluation and Draft Section 4(f) Evaluation

Dear Ms. Walker,

Thank you for the opportunity to enter another Comment into the record for the Albion River Bridge Project. Please include the following as official Comments on the DEIR/DEIS mentioned above.

1

1.Request Consultation on the National Historic Preservation Act

The Sierra Club Mendocino Group has asked for a response from Caltrans on our request (Aug. 15, 2024) to be acknowledged as an "additional consulting party" on all Caltrans negotiation with that relate

to the National Historic Preservation Act, section 106 (pursuant to 36 Code of Federal Regulations Part 800.3(f)(3),). Since the address we were given for Jeffery Carr, Acting Section 106 Coordinator was incorrect, we would like a response from your office on this question.

2

2. Request confirmation that Caltrans will be producing a Supplemental EIR/S covering the Option to Preserve and Maintain the Historic Albion River Bridge.

While Caltrans has produced many photos, reports and graphics on the shortcomings of the Historic Albion River Bridge in the current informational meeting, Caltrans has not addressed the Comments on bridge safety and rehabilitation entered by Dr. Abolhassan Astaneh-Asl, Ph.D., P.E., or Mr. Norbert Dall (for the Albion Bridge Stewards) We feel that these questions are essential to choices of an appropriate Option and the certification of the EIR/S. We would like to see a point-by-point comparison of the opinions of both engineering and social experts. As always, when Caltrans is both the applicant and the judge, it behooves Caltrans to investigate and seriously consider the opinions of the opposing side.

3

3. Request Caltrans develop a Supplementary Feasibility Study for Public Access.

The Public Access Feasibility Study is woefully in adequate in conformance with California Streets and Highways Code, Section 84.5, which states:

> "During the design hearing process relating to state highway projects that include the construction by the department of a new bridge across a navigable river, there shall be included full consideration of, and a report on, the feasibility of providing a means of public access to the navigable river for public recreational purposes." (emphasis added)

Instead, the report lists current access points (all private, one closed indefinitely) and the reasons why Caltrans will not consider any other solution.

In fact the report misses the very important State Land Commission lease of the riverbank, which is both non-exclusionary, and outside of the property holding of Seto (Albion Marina and Campground). The lease mandated public assess, including for non-paying people, across the campground, to and along the riverbank. This strip of land could very well be used as access to the tideland seasonal boat launch and to a newly established parking area in the expanded Caltrans Right-of-Way. At a bare minimum we request that the Feasibility Study include an accurate boundaries of the Seto properties (as detailed in the Tidelands 21 Survey disposition, 9.06 acres) and the State Lands Commission lease adjoining it.

Caltrans will be purchasing more property for the Right-of-Way for both construction "and to provide access for future maintenance of the facilities." (Emphasis added), and also paying hundreds of thousands of dollars to Seto for use of the valley floor. This seems to be the perfect time to establish MAXIMUM public access as required by the Coastal Act, Chap 3, Article 2, Section 30210. Please consider expanding the objective of the Right-of-Way to include parking by the rehabilitated or new bridge, in the Supplemental Feasibility Study.

If Caltrans deserves an access, so does the Albion community.

The request for improved public access is in response to the Albion River Bridge Project closing ALL public access for 3-5 years while construction is underway. This closure would be in effect for any of the Options mentioned, including the Preserve and Maintain Option mentioned above. In no way is it proposed in reaction to ANY of the bridge construction Options. Public access is a separate issue under the Coastal Act, the Mendocino County Land Use Plan Coastal Element, and the Coastal Commission.

Sincerely,

Rixanne Wehren

Rixanne Wehren
Chair, Coastal Committee
Sierra Club, Mendocino Group
P O Box 522
Mendocino, CA 95460

Response to the Sierra Club

1. The Sierra Club is acknowledged as a consulting party pursuant to NHPA Section 106 and has been included in consultation pursuant to Section 106. See also Section 5.3, *Agency Consultation and Coordination,* and Table 77 in the environmental document.
2. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation). This final EIR/EIS has been prepared pursuant to CEQA and NEPA.
3. A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. A supplemental feasibility study is not warranted.

   The Public Access Feasibility Report and the ED identify that there is no deeded public access to the Albion River or the beach; all of the access points from land are on private property. The south bank/bluff slope and north slope are steep and it would be impractical to provide access that is compliant with the Americans with Disabilities Act (ADA) within the state ROW. The public can access the Albion River through the privately-owned Albion Campground with a day pass or by reserving a campsite for a fee. In addition, in 2024, the Albion River Campground website indicated that the general public was welcome to access the beach without charge during normal day-use hours if they do not park on private campground property and do not use the facilities. The other private access point, Schooner's Landing Marina, has previously provided river access, but is currently closed. On the south side of the Albion River, self-propelled personal watercraft can be launched from a facility owned by Pacific Union College for a fee.

   As noted in the comment, there was a prior lease which, for the duration of the permit, had a condition for non-fee pedestrian access along the shore. This lease was between the property holding of Seto and the State Lands Commission for public access across the campground. The campground is private property and, as mentioned above, has allowed access to the beach for pedestrians. There is no specified easement or other deeded access across private property.

   For additional details regarding public access, see Master Response 5 (Public Access During Construction). See also Response 6 in Section 4.11. Impacts to recreation were fully analyzed in the ED and were determined to be less-than-significant under CEQA; therefore, no mitigation is required.

4.13 ZIA CATTALINI, FRIENDS OF ENCHANTED MEADOW

TO: Caltrans North Region - Environmental ~ PRESERVE and MAINTAIN the ALBION BRIDGE

1

The Mendocino Biological Field Station (MBFS) located near the Albion River's mouth and historical Albion Bridge; fostered classes and biological studies for decades. Relevant today, an unpublished Master's thesis by Stanley Ernest Moser, was edited, printed, and distributed by Richard White M.D., former Director of The Mendocino Academy of Science and luminary of the MBFS.

Moser's work: The Intertidal Zonation of Marine Life near Albion, revealed the diverse, intertidal communities of plants and animals living in the Albion River's cove, mouth, and estuary waters.

Caltrans planned destruction of the Albion Bridge and new construction replacement will threaten and harm the ecology and lives of these vulnerable intertidal communities. Additional plant and animal species living adjacent and beyond this zone will be negatively impacted.

2

Caltrans bridge plans are unnecessary, wasteful of money, threatens the natural habitat and scenic values, disrupts commerce, recreation, and public mobility. This project is senseless because the Albion Bridge is sound structurally and does not need replacing. Caltrans ignores an important fact: the Albion bridge was recognized and deemed historical in 2017, by our federal and state governments. Why does Caltrans elect to destroy rather than restore a monument of Mendocino County history?

3

Friends of Enchanted Meadow, a non-profit based in Little River owns and stewards a 54-acre wetland preserve upriver from the MBFS. It is estuarine and symbiotic with the Albion River. The river winds one and a half miles through the preserve's center, and daily the river and wetlands change dramatically due to shifting high and low tides. Most of this area is designated "scenic" within The Wild and Scenic River System, Caltrans plans are a nemesis to the health of this precious area.

We've heard "what happens in Vegas stays in Vegas", not so on the Albion, what happens at the mouth ripples throughout. The fluidity of water in motion is a great delivery system. Negative impacts will manifest from Caltrans proposed bridge demolition/construction plans, eventually toxic, chemical contaminants will flow east and seep into Friends' wetland preserve. The balance of this delicate ecosystem will be altered. Mutation and reduction of plant and aquatic life is consequent.

4

One summer, many years ago, a friend and I rode our ten speeds to Canada. We began our trek in Sonoma County and were not pressed for time as were most of the cyclists we encountered. We lived out of our pannier bags, and camped every night. As we ferried from Port Angeles, WA, to Victoria the long, curving coastal road behind us was no longer a mystery, but familiar. A home away from home.

Last year, I revisited a portion of Oregon's coastal route I cycled years before with my friend and felt a sense of loss, it was different and unrecognizable in places. The niches and nuances that sculpted the road's character and whimsy were gone. The highway was paved much wider than necessary and straightened. Its unique personality was gone, it had become generic.

Formulaic bulldozing and resculpting of our terrain is trending heavily today on our coastal highway. Currently Caltrans is bulldozing a classic marine terrace just east of the Navarro Point Preserve destroying the natural topography of the bluffs. This project is overkill, way out of scale for the remedies needed. Caltrans, please stop this atrocity and rethink your Navarro Ridge Safety Project.

It's understandable change and improvements are inevitable, but when "improvements" morph into the elimination of scenic, historic, and geographical values an essence of a place and time is erased, forever lost and the future is cheated of what was.

Zia Cattalini, Director, Friends of Enchanted Meadow 9/9/24

Response to Zia Cattalini

1. The ED was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   A comprehensive environmental analysis was completed for the proposed project. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including for impacts to biological resources. Under CEQA, mitigation measures were identified for potentially significant impacts, with their implementation, less than significant level. See Appendix D*, Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. See Master Response 13 (Environment) for more information on effects to environmental resources.

   With respect to commerce, recreation, and public mobility, the proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction.

   The Albion River outlet would remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. Further, work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**).

   For additional details regarding economic impacts, public access, and traffic impacts, see Master Responses 6 (Local Economy), 5 (Public Access During Construction), and 7 (Traffic and Emergency Response).

2. The ED identifies that the existing bridge is structurally deficient. The proposed project is needed to address the functional, safety, and structural deficiencies of the bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   The ED acknowledges that the existing bridge is listed in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR), and that the bridge would be directly impacted by the proposed project (see Section 4.3.5, *Cultural Resources*). The ED determines that removal of the existing bridge would result in a significant and unavoidable impact to cultural resources under CEQA.

3. The existing bridge has preservative-treated timbers in a state of ongoing deterioration. The proposed project would remove the treated timbers, reducing the risk of further water quality impacts from wood preservative leaching into the Albion River. Further, contaminated soil encountered during construction would be properly managed in accordance with local, state, and federal requirements.

All removal work would be carried out in a manner to limit exposure of workers and the environment to the contaminants.

During construction, the proposed project would implement a site-specific Stormwater Pollution Prevention Plan, which would include construction site BMPs to control sedimentation, erosion, and potential chemical pollutants.

4. Comments noted.

Chapter 5. Individual Comments

5.1 ALAN STEIN

From: Alan Stein
To: albionbridge@DOT
Cc: Walker, Liza M@DOT
Subject: Comment on Albion River Bridge, Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS)
Date: Saturday, August 24, 2024 4:17:00 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Walker:

1

I've reviewed the illustrations and reports of the DEIS/DEIR Draft Environmental Report/Statement for the Albion River Bridge replacement.
https://www.albionriverbridgeproject.com/deir-deis/

I offer these comments for the record to be attached to the FEIS. I am in favor of alternative 1B.

The bridge is a vital transportation link to the coast. All manner of commerce traverse it. In case of blockage of highway 20, the Albion bridge would be the main large truck route.

As a resident of Mendocino since 2020, I have travelled the bridge in conditions ranging from calm to fierce winds.

Every time I crossed it, I worried about its soundness. I had observed rusting metal connections on many of its towers.

In the last five years, I have avoided driving over it, because its 80 year old age and condition indicate it is not safe for continued use regardless of repairs.

I am in favor of selection of Alternative 1, the West alignment, and B the arch style for the following reasons.

The arch style has its main support in the cliffs slightly above storm level tides and spray. Elimination of the splash zone prolongs the life of rebar by eliminating the dry wet cycle that drives salts into the concrete.

I don't know if the wind load is less in the arch style structure, but the style is consistent with many iconic bridge views along SR 1.

While the totality of open space is less than alternative A, this iconic arch structure in my view would be more pleasing to the eye.

The West alignment for B alone it appears obviates the need to drive piling into the flood zone of the river.

For these reasons, I urge you to select Alternative 1B and dismiss the self serving local opposition in Albion which turns a blind eye to the saftey of the majority of people who transit the bridge.

Moreover, the existing bridge leaches arsenic and other poisons related to wood treatment into the river and estuary with unmeasured impacts on juvenile crab, salmon fry, birds, and

predators.

The sooner the existing bridge is razzed the better.

Sincerely your,

Alan Stein
Mendocino 95460

Response to Alan Stein

1. We note your support for bridge replacement, specifically Design Option 1B (West Arch).

   The identified preferred alternative is Design Option 2B (East Arch), which was found to be the environmentally superior alternative and is similar to Design Option 1B (West Arch) in that it involves a spandrel arch that will allow for expansive views beyond the bridge.

5.2 ALEX DE GRASSI

9/1/2024

CalTrans/Albion River Bridge Project

To whom it may concern:

1 My wife and I own a house in Albion village that was built as Norgard's Store in 1908—It's been added onto and refurbished but it still adheres closely to it's early 19th Century interior and the look of all the other houses in the village. It stands approximately 300' southeast of the southern abutment of the historic Albion Bridge. We purchased the home in 2015 and have used it both as a short-term vacation rental and as a second home, our primary residence being in Ukiah. Our north facing windows provide an excellent road-level view of the bridge.

2 Though I am not an engineer, I have had ample opportunity to observe the structure and speak with architects and engineers about it. I am not convinced that the bridge would not meet current safety and seismic standards if properly restored. Why not consider spandrels, maybe another concrete tower and another steel truss if needed, while simultaneously shoring up the footings of the wooden towers at beach level. Wouldn't it be possible to create either a visibly modest exoskeleton or a superstructure that resolves safety concerns while providing for pedestrians/bicycles as well?

3 We are not happy about our road—Albion River Road Southside--and parts of our neighbors' property being torn up by extremely loud heavy equipment for a period of 3-5 years. Not only will it kill our short-term rental business for the duration and possibly longer, it will potentially alter the landscape of the neighborhood permanently and make life miserable for the whole village during

4 construction. It will also be economically devastating to the other B&Bs in the village and two stores that not only serve locals but the tourists and campers on the flats who will be absent for 3-5 years.

5 I understand the rationale that Caltrans has for total replacement: meeting current safety and seismic standards, the need for pedestrian and bicycle lanes, tsunami and rising sea level concerns, but surely these problems could be solved with some ingenuity. Here is a chance for Caltrans to shine and make history by taking the less expensive, less disruptive, and infinitely more satisfying project of making our national landmark secure for another 75 years. The Albion Bridge, like many of the historic buildings along this section of the coast are the reason people visit our area, and that is what sustains our local economy. If we replace our historic infrastructure, what's left to visit?

Thanks for your attention.

Sincerely,

Alex de Grassi
33891 Albion River Road Southside
Albion CA 95410
707-318-7932

Response to Alex de Grassi

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document (ED) in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).
2. The addition of a walkway to the existing bridge to provide pedestrian access was not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. However, a Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.
3. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

   Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Responses 7 (Traffic and Emergency Response).

   The ED notes that any land used as a temporary construction easement (TCE) during construction would be returned to an acceptable condition per the terms of the TCE, including site restoration, prior to the return of that land to the original owner after completion of the construction activities (see **AMM-AR-5**).

   The proposed project would not have significant noise impacts. Construction and associated noise would be temporary, and the project would implement minimization measures to reduce noise impacts (see **AMM-NOI-1).** For additional detail regarding temporary noise impacts during construction, see Master Response 10 (Noise).
4. The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).
5. The proposed project would provide a structure with improved bridge approaches and a 75-year service life, which would ensure safe and reliable access across

the Albion River. As noted in Response 1 above, rehabilitation would not meet most of the basic project objectives.

5.3 ALISON DE GRASSI

September 5, 2024

Re: CalTrans/Albion River Bridge Project

To whom it may concern:

1 My husband and I own a house in Albion village located at 33891 Albion River Road South Side. When we bought the house in 2015 and made the decision that it would be our second home and vacation rental, we named the house: it's the Bridge House in Albion. We called it that for a reason: the spectacular view we have of the Albion River bridge.

Over the years of owning the property, which was originally Norgard's Store built in 1908, we have added to the beautiful gardens that surround the house and preserved the property. Our garden has been part of the Mendocino Art Center's Garden Tour fundraiser and we have invited numerous people who were interested to have a view of the iconic bridge to take photos from our back deck.

It baffles me as to why CalTrans is unable to create a plan to preserve, renovate, and upgrade the current bridge structure. I just returned from Scotland, a place filled with engineering marvels, all preserved for future generations to enjoy. Why can't we do that here?

2 Our house is on the downward slope of Albion River Road South Side. If CalTrans is successful in moving forward, the road will be used to access a staging area. What does CalTrans plan to do? Move heavy equipment, trucks, cranes, concrete, pilings, drivers down our tiny road? And this will continue 6 days a week, 12 hours a day, for 3 to 5 years. Our house will be unusable. Our vacation rental business will be

3 destroyed. Likely our house and garden will suffer damage. And our view and village will never be the same again. This proposed work will destroy Albion.

Sincerely and unhappily,

Alison de Grassi
33891 Albion River Road South Side
Albion, CA 95410
707.508.6752 | alison@degrassi.com

Response to Alison de Grassi

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document (ED) in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

   Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).

   The ED notes that any land used as a temporary construction easement (TCE) during construction would be returned to an acceptable condition per the terms of the TCE, including site restoration, prior to the return of that land to the original owner after completion of the construction activities (see **AMM-AR-5**).

   The proposed project would not have significant noise impacts. Construction and associated noise would be temporary, and the project would implement minimization measures to reduce noise impacts (see **AMM-NOI-1).** For additional detail regarding temporary noise impacts during construction, see Master Response 10 (Noise).

3. With respect to aesthetics, the project proposed mitigation measures **AMM-AR-1** through **AMM-AR-3**, which require aesthetic treatments to the bridges, guardrails, and retaining walls be included to address context sensitivity, and **AMM-CR-3**, which addresses the adverse effects to the Albion River Bridge. These mitigation measures would lessen the impact to aesthetics but would not reduce the impact to a less-than-significant level under CEQA.

   After consideration of public and agency comments, Design Option 2B has been identified as the preferred alternative. Design Option 2B is an arch design, which would allow for expansive views beyond the bridge.

5.4 ALISON GARDNER

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Alison Gardner E-mail/Phone# garaway58@gmail.com

Address (home) Box 838 City Albion State CA Zip Code 95410

Authorized Representative (name of organization or agency) _____

Address (business) City State Zip Code

COMMENTS Please maintain the old bridge rather than replacing it. The old bridge is historic, and if maintained, will last a long time, still. I disapprove of your apparent intention to widen the highway through Albion. Cars already travel that stretch at about 60 mph (tourists are used to driving 65-70mph) and I'm concerned that adding another 2' to each lane is likely to increase the speed of traffic, making turns onto the highway much more dangerous. 1

Your Draft EIR that I perused has a poor and incomplete botanical survey. I have looked at some of the properties involved that were owned by friends who gave me permission, and perused some of the other areas from the roads. There are many plants I saw that are not on your plant list, including at least 21 rare and endangered pygmy cypress. Your botanists listed "Lathyrus sp." on the plant list, with no further discussion. There is a rare Lathyrus in the area: Lathyrus palustris, hence any Lathyrus should have been keyed to species. Plants are my area of expertise, ~~botany~~ and your shoddy botanical report does not give me confidence in the rest of your analysis. (Continued on back) 2

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

3

Also, you claim that you will replant and restore the vegetation to a similar condition or better than how it is now. Every CalTrans revegetation project that has been done since I moved to this area 55 yrs ago has been abyssmal, using non-native plants, or plants native to other areas of Calif. They all have been very weedy, often importing bulbil watsonia, Italian thistle, and other non-native weeds. Hence, I am suspect of your mitigation.

4

The Albion Bridge is scenic, beautiful, and functional. I feel it could be safer, seismicly, than a concrete bridge, as wood has flexibility. Which is safer in an earthquake, a wood-frame house, or a concrete house? It is well known that a wood frame house is safer, so why would a concrete bridge be more safe?

5

Replacing the bridge is unnecessary and will cause environmental damage that you (from my point of view seeing the results of your past projects) have neither the ability nor patience to remedy. Actual functional mitigation would include washing all equipment used in the project before they are brought to the area, to avoid bringing in weed seeds or phytophthera root rots. It would include improving the area by removing the non-native Eucalyptus, and planting thousands of actual locally sourced native plants, so you are not bringing in weeds, or outside genetics or varieties. These plants will need to be watered through the first two summers, until their root systems are established, or more than that if the plants are small when planted. The planting pallette should include rare species that may be disturbed or destroyed during construction, which are very difficult to come by. All these plants will also need to be protected from deer and other wildlife. And weeding will need to be done for at least 5 yrs. This is not something that I've ever seen you do.

No Replacement! Keep our Albion Bridge, maintain it and repair it!

6

Also, I disagree with your assertion that vehicles are increasing in size. As gas prices go up, more and more people are buying smaller, lighter cars for better gas mileage.

Response to Alison Gardner

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

2. *Lathyrus palustris* is known to occur primarily in wetland habitats. During wetland delineations, focused surveys were conducted in wetland habitats, and *Lathyrus* species were not observed in these areas. All other species were identified to the appropriate taxonomic level. Seasonally appropriate surveys for sensitive plant species would be completed prior to construction (Standard Measure **BR-4[A]**).

   Caltrans biologists revisited the project site on October 21, 2024, to review the reported sites of Mendocino cypress. It was verified that Mendocino cypress is present at four locations on the east and west sides of State Route 1. The environmental document (ED) was updated. See ED Section 3.4.3, *Plant Species,* and Section 4.3.4, *Biological Resources,* for a discussion of pygmy cypress.

3. The Revegetation Plan prepared for the project would include a plant palette with regionally appropriate native plant species, and erosion control would be a hydroseed mixture of native species along with fast growing sterile erosion control seed, as required by the Erosion Control Plan. The Revegetation Plan would include an invasive species management component, and a minimum of 5 years of annual maintenance and monitoring with success criteria for plant survival and invasive species cover.

4. The bridge is seismically deficient as it is susceptible to catastrophic failure or “collapse” during an earthquake. The rehabilitation options would retrofit the bridge with restraining devices to make the bridge more resistant to failure in the event of an earthquake. However, a seismic retrofit still allows for a rocking motion in the bridge during an earthquake to dissipate energy and does not meet the same modern seismic performance standards of a new bridge.

   Failure to eliminate seismic deficiencies is one of the many project objectives that the rehabilitation options fail to satisfy.

5. A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. In addition to these measures, standard measures would be implemented. This includes cleaning equipment prior to entering the job site, and adherence to the CDFW

cleaning/decontamination protocol for all field gear and equipment in contact with water (Standard Measure **BR-3**). Revegetation plans always include a plant palette that consist of locally sourced native plants, as well as a watering regimen, monitoring requirements, and measures for protecting plants from wildlife such as deer, as well as invasive species control (Standard Measure **BR-4[B]**). The Revegetation Plan would also include species specific measures, such as for harlequin lotus. See ED Section 3.4.3, *Plant Species,* for information on special status species.

6. Comment noted.

5.5 ALOURA HARROLD

From: Aloura Harrold
To: albionbridge@DOT
Subject: Comment for Mendocino County Albion Bridge
Date: Wednesday, October 2, 2024 9:19:04 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

It has taken me a long time to write this, as it's been hard to gather the words that would convey what is going on in my mind, as well as my neighbors and people in my community.

I know that I speak for myself and my community that the work that has been done by Caltrans in this last year has been nothing but devastating, heartbreaking, and a travesty to our beautiful trees we say hello and good bye to everyday, going from Mendocino to Fort Bragg, and Mendocino all the way to Coverdale. The destruction of the trees and vegetation in our home has been mentally disturbing and nothing but a nightmare. I personally have shed tears feeling like I failed my home town in stopping the destruction before it started. We did not want things to change in this way. And we certainly would have spoke up if we knew the plan was to cut down our trees and change the things that we know and love . I can't not state enough the loss we have from the natural scenery changing so much. Our families have been here for generations and even cutting a limb off a tree, yet alone an entire grove of trees and shrubbery would be noticed. We don't see improvements, all we see is destruction.

Now that you know and understand how our community has been mentally struggling from the loss of trees and memories of the vegetation we have known for so long I would like to address the Albion bridge.

2

I know I am speaking for myself and many others that since the Jack Peters Bridge has been set into motion and among other "improvements" we now don't want any of it. We would like to save our tax dollars and keep the resources for other things. When it comes to changing anything in Mendocino, we would like to keep it almost exactly the way it is with minimal invasiveness and destruction. We do not feel taking down the bridge that our neighbors and ancestors before us work so hard to put up is truly putting us in danger , and that there is not sufficient evidence at this time that the bridge cannot be restored and would like more significant public proof that restoration is not a great option. We would like pictures, videos, and examples of other bridges that have had similar states of being and work done, and what it should look like versus what the Albion bridge currently looks like. Our community and family have protected this area for many many generations and we plan to keep it that way. We love our home and would politely like the respect of more information and if it can't be proven that the Albion Bridge is a structural danger please peacefully stop any current motion of changing more or our home and leave Mendocino County to help other counties that might truly need it.

Thank you for your time and understanding but at this time we will not approve anymore of our tax dollars being spent on making "improvements" around our county, or even tree and vegetation maintenance. We would like to only fix the roads that are here and not widen or enhance the driving space, or accommodate bicyclist that do not truly travel on the roads because each city is much too far to travel on bike for the average person, and most certainly accommodate pedestrian walking spaces along a main highway. For the one or two people that do bicycle, we would like them to continue to maintain their safe bicycle riding , as we will

maintain our safe car driving.

Thank you.

Aloura Harrold

Response to Aloura Harrold

1. Vegetation removal associated with the proposed project would be limited to only the amount necessary to facilitate the construction work. Vegetation that is removed or disturbed due to construction would be replaced in accordance with a project-specific Revegetation Plan that utilizes regionally appropriate native plants (see **AMM-AR-4**).
2. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document (ED) Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The existing bridge deck is 26 feet wide, consisting of two 12-foot-wide travel lanes and 1-foot-wide shoulders. The deck does not meet the Mendocino County Land Use Policy (LUP) minimum paved shoulder width of 4 feet where feasible (LUP 3.8-6). The existing narrow shoulders do not provide additional recovery area for motorists and do not provide safe access for multimodal users.

   The bridge serves as a portion of the legislatively designated Pacific Coast Bike Route (PCBR) and serves as a planned component of the California Coastal Trail (CCT). The PCBR is an 1,800-mile cycling route that follows the west coast from Canada to Mexico, generally along State Route (SR) 1. The CCT is a network of public trails being developed to provide a multimodal opportunity to walk and bike the length of California's coastline from Oregon to Mexico, the majority of the trail in Mendocino County is planned within the SR 1 roadway.[13] Cyclists and other multimodal users share lanes across the bridge with motorists, as there is no designated lane or sufficient shoulder for multimodal users. Caltrans' Director's Policy (DP) 37 establishes a policy that recognizes the multimodal users of the transportation system and requires all transportation projects to provide "comfortable, convenient, and connected complete streets facilities for people walking, biking…unless an exception is documented and approved" (DP-37, 2021).

   Neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River. Providing safe multimodal access is one of the many project objectives that the rehabilitation options fail to satisfy.

[13] CoastalWalk, California Coastal Trail Association. (n.d.). Mendocino Section 13 Little River to Navarro Road. Retrieved from: https://californiacoastaltrail.org/trail-section/mendocino-section-13.

5.6 ANN ZOLLINGER

From: Ann Zollinger
To: albionbridge@DOT
Subject: Access Denied
Date: Friday, August 16, 2024 4:06:12 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi Ms. Walker,

I attempted to do your service but this and contact us says access denied.

I live at 33975 Albion River South Side Road - close enough to the campground that I have had a conversation with a friend on the guest docks. I have been a licensed architect for almost 40 years.

To be brief:

1. I am in favor of replacing the existing bridge. I had a 10-year-old steel roof on my house that had to be replaced due to severe deterioration of the steel. In removing the purlins to rip to the correct width, out of 200+ 1' long lag bolts that had to be removed, 2 came out without breaking due to rust. It is inconceivable to me that many bolts in the existing bridge are not ready to shear let alone in an earthquake causing cross bracing to fail causing the collapse of the then rectangular supports then the deck collapsing until the bridge either collapses or is structurally compromised.
2. If this were to happen Albion proper would be isolated from essential services such as groceries, banking, etc. for years with an hour drive (Hwy 128 to Flynn Creek to Comptche Ukiah Road) to services.
3. I believe that only the two alternatives on the west side of the existing bridge should be considered. Noise from trucks (even at 3:30 am) and motorcycles is already disturbing those of us living in Albion village. Traffic should be moved AWAY from the residential area not closer to our homes.
4. On using the campground as a staging area. First, the campground floods at least once a year when rain and a King tide are present. And next, it would be my hope that no one will be allowed to be in the campground from 5 pm to 7 am to not disturb residents of Albion. The current campground has very strict rules regarding noise and lights.

1

2

3

I can expand on any of these points. I appreciated the CalTrans presentation on Tuesday with one exception. I do not believe that the bridge's potential for structural failure was explained and illustrated in a simple way using a triangele as a stable geometric shape that prevents a rectangle from collapsing into a parallelogram in the event of an earthquake is even one cross brace where to fail.

4

Ann Zollinger
707 328-3192

Response to Ann Zollinger

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.
2. After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B was found to be the environmentally superior alternative and is similar to Design Option 1B (West Arch) in that it involves a spandrel arch that will allow for expansive views beyond the bridge.

   Following construction, the predicted highway noise levels do not substantially exceed the existing noise levels at nearby sensitive receptors. Further, noise reducing pavements (i.e., “quiet pavements”) would be used, which have been shown to have at least a 3 dB decrease in noise levels. For additional details regarding noise impacts, see Master Response 10 (Noise).
3. The ED acknowledges that the Albion Campground is within the floodplain. During construction, the project site would be monitored on a regular basis as well as each time the National Weather Service issues a flood risk warning at the closest monitoring station (Fort Bragg) to assess the potential for debris loading and implement measures, as determined feasible, to remove staged materials and racked debris that poses a threat to temporary and permanent infrastructure and channel/bank stability. Measures would include the use of on-site equipment (e.g., excavators) to remove staged materials from the site in advance of a flood event, and to dislodge or remove and dispose of racked debris caught on temporary trestles in the river, when site conditions allow for the safe removal of debris (see **AMM-HF-1**).

   With respect to operating hours, the project would implement minimization measures to reduce noise impacts, including a restriction on noise-generating construction activities to between 7:00 a.m. and 7:00 p.m. Monday through Saturday, with no construction occurring on Sundays or federal holidays, where feasible. If work is necessary outside of these hours, notifications will be made, and additional noise controls will be implemented where practical and feasible (see **AMM-NOI-1).**
4. Comment noted.

5.7 ANNEMARIE WEIBEL

To Caltrans,

1

I am a mother, grandmother, educator, landowner, and taxpayer. I have lived in Albion since 1983. It is not legal that during the scoping meeting on 5-5-2022 you wanted input on the Albion River Bridge (ARB) Replacement/Rehabilitation Project and now in your DEIR/DEIS propose the removal of the ARB. While residents were believing all along that Caltrans was still considering to rehabilitate the bridge and finish the seismic retrofit of the timbers Caltrans informed Native American tribes and various agencies ever since 2015 that they are considering replacing the bridge, looking for alternative designs to replace it, mentioning the bridge replacement project without informing the public that they already made up their mind. See electronic pages 94, 101, 104, 162,….
https://www.albionriverbridgeproject.com/resources/appendices/

You explained during the virtual (online) public scoping meeting that you will do an EIS for the proposed ARB Replacement/Rehabilitation Project. Participation by the public was greatly reduced as in this area not many people have access to Wi-Fi at home, do not know how to deal with zoom meetings and especially not with the type of meeting Caltrans set up. Many people were not able to connect even those that are used to zoom meetings with other organizations. See **Community Impact Assessment page 1-1**.

2

The DEIR/DEIS is incomplete, variously inaccurate, flawed, and identifies neither a Caltrans-proposed project for analysis, nor the environmentally preferred **(least environmentally damaging)** feasible alternative which consist of preservation of the historic ARB through historically consistent and sustainable maintenance, repairs as necessary, completion of the seismic retrofit, and appropriate pedestrian-bike way and bridge road deck drainage enhancements. The unique historic, iconic 80 year old ARB was listed with the National Registry of Historic Places and in the California Register of Historical Resources in 2017. See **Community Impact Assessment electronic pages 21-24**.

Caltrans is required to prepare an accordingly complete, accurate, and legally consistent ARB project description, including the historic bridge preservation alternative and with National Historic Preservation Act stakeholder consultation, analyze the project (and alternatives) in a new DEIR/DEIS, and produce it for public review and comment, including through oral testimony at a hearing in a local venue during a reasonable period of time that is proportionate to the length of the document.

3

The preservation and rehabilitation of the existing historic ARB has the least impact on adjacent roads and surrounding environment. I am requesting that Caltrans increase the area of the geologic and biological surveys and include the plans for widening and reconfiguring the North Bank Albion River Road in a new DEIR/DEIS. There are many NEPA and CEQA potentially significant direct, indirect, and cumulative adverse environmental, social, and economic consequences, effects on the environment, on the Albion (human-social) community, and the Albion and regional coastal economy that the project entails.

4

Caltrans tries to take credit for the fact that the bridge built during WW2 lasted that long without recognizing that it was the 1st growth Douglas fir pressure treated wood, and the excellent craftsmanship by Fred J. Maurer & Son which helped this bridge last that long. In fact in the **video on Caltrans' web page** it is indicated that the timber used was recycled, a misstatement that was also used in the 2015 New York Times article by Carol Pogash, Wikipedia, and a Chamber of Commerce article.

5

Caltrans has done a fairly good job repairing and maintaining the historic and iconic 80 year old ARB until about 1990. Ever since then the repeated estimated costs for recommended work not done for maintenance and repair of the ARB added up to $33,362,350.00 by 2020. It is no wonder then that Caltrans in 2015 for the first time rated the Bridge's Substructure and the Structural Appraisal rating with a 3 (meaning poor) to have an excuse to tear it down.

6

Bridge conditions reported to the Federal Highway Association are collected in the **National Bridge Inventory**. Since 2022 the terms have changed where bridges are rated good if deck, superstructure, and substructure are at least 7 on a scale from 0-9, if rated 5 or 6 they are considered fair, and a bridge is considered to be in poor condition if any element is rated 4 or less. So of course it is a shock when in 2015 the substructure was rated a 3 (poor) which was clearly erroneous. In 2018 the deck, superstructure, and substructure were rated a 5 each (fair), and based on the 2023 inspection the deck was rated a 5 (fair), but the superstructure, and substructure was a 4 (poor). Also Sufficiency Ratings have come down after the 2001 rating of 71.5 (structurally not deficient) to a 63.9 (structurally not deficient) in 2013 to a 15.3 (structurally deficient) in 2015. In 2016 the deck got a new paved roadway (asphalt surface placed on tar). The latest Sufficiency Rating is 31.3. The most recent review of the 2023 Caltrans Inspection Report on the Albion River Bridge by Engineer A. Astaneh-Asl, Ph.D., P.E.,M.ASCE's clearly points out that the condition rating of poor assigned to the Superstructure and Substructure are arbitrary and not based on actual inspection data. I am asking you therefore before you do anything else to correct the 2023 Inspection Report for the ARB where the actual element data contained in the report seems to be reasonably accurate.

7

Timber bridge engineers Ben Brungraber P.E., Ph.D. and Dick Schmidt P.E., Ph.D. FTET in their report from 2018 on the Albion River Bridge mentioned the problem with placing epoxy into checks which causes moisture to build up leading to rot. They wrote: "The checks tend to be aligned with the longitudinal axes of the members, which suggests that the members have remarkably straight grain, another indication of high- quality material. Checks are not generally regarded as strength-reducing defects and do not require repair. Checks on the sides or bottoms of horizontal members and on any face over vertical or diagonally oriented members are able to drain freely when subjected to rain water. With proper drainage detailing, the bridge deck also acts as a roof to protect the superstructure and trestle towers from stormwater runoff." Unfortunately Caltrans does not regularly and properly clean the bridge, so that scuppers get plugged causing the water to run down the side of the bridge and cause rot. Potholes are not getting fixed in a timely manner and the railings have not gotten a fresh paint job in a long time. https://savehighway1.org/2018/09/11/remarkably-good-condition-read-the-independent-engineers-report/ Engineer A. Astaneh-Asl, Ph.D., P.E.,M.ASCE indicated in **Preservation of a Historical Timber Bridge in California** that the corroded bolts need to be replaced by better galvanized, zinc coated modern bolts and covered with plastic to be protected from corrosion. https://ascelibrary.org/doi/10.1061/9780784481332.016

The community is aware that Caltrans was planning to build a new bridge at least since 1987. Ever since 2009 Caltrans used all kinds of scare tactics to make residents believe that the railings were inadequate (the fully loaded logging truck that broke through the railing because a car hit him head on would have even broken through a metal railing); the wood could be rotten (yes, the wood next to the scuppers is starting to deteriorate as the scuppers do not get cleaned and Caltrans informs locals that they could not repair the sides of the bridge without having to close down the entire ARB. Our engineers indicated otherwise); that the bridge was not safe (if it would not be safe, Caltrans would be required to close it immediately); that the bridge is "functionally obsolete" (the world famous Golden Gate Bridge and Bixby Bridge also do not meet today's design standards for shoulder width, and pedestrian and bicycle lanes and are being constantly maintained); that the ARB is "structurally

deficient" (with a 1,000-year tsunami there would be minimal debris and in an earthquake the seismic retrofit that strengthened the steel portion of the ARB which was the most vulnerable component would probably fare better than a new concrete bridge, especially if the seismic retrofit of the timber structure would be done); that maintenance is too expensive (minimal compared to the cost of a new bridge); that it would not be safe to have two heavy trucks on the bridge at one time (**The 2022 Highway Bridges: Conditions, Funding Programs, and Issues for Congress** lists that structures that can't carry maximum loads for the roadway must be posted and Caltrans did not); that it is too narrow (the current design is 81% wider and at the 3-23-2017 public informational meeting when Caltrans realized that the community was not willing to have a new bridge over the Albion be 55 ft. wide indicated that the Coastal Commission might not allow them to have one 6 ft. wide shoulder on each side of the bridge); that timber is the wrong material to use along the coast (it is "architecturally appropriate for California's scenic Pacific Coast and indeed, it is not only an engineering feat but also plays a social/economic role in the region by acting as a draw for visitors" wrote engineer A. Astaneh-Asl, Ph.D., P.E.,M.ASCE) in **Preservation of a Historical Timber Bridge in California**. With this area having lost logging and fishing, tourism is what people survive from. Caltrans with their interest to turn Hwy 1 into a speedway by widening roads & bridges wherever they can are chasing away the eco tourists that come here for the beauty of the area. The State Parks knew better when they rehabilitated the Pudding Creek Trestle and constructed it in accordance with ADA standards. By doing so they created a vista point, and protected a historic structure.

The Caltrans "no project/no action" minimized maintenance/repair alternative is also inconsistent with the preservation of the historical ARB structure and context, and therefore not a reasonable "replacement" project alternative.

Sustainable preservation of the ARB - when designed with the community to be sustainable and consistent with community objectives, the California- certified Mendocino County Local Coastal Plan (LCP), the Coastal Act, the federally-approved California Coastal Management Program, and historic preservation standards can be achieved through integrated proportional environmental review.

8

Caltrans had gone through – and thought it had finished – the combined project **Value Analysis Study** (VAS) process in 2013 but apparently hadn't managed to meet the regulatory requirements, so was in the process of redoing it in 2017. To my knowledge this never happened. The VAS was discussed at the Caltrans November 14, 2017 meeting where it became clear that a Caltrans representative either (1) didn't know the federal rules that govern VAS and/or (2) did not intend to follow them, whatever they might be. Subsequent VAS meetings were first postponed and ultimately abandoned altogether – at least as far as the Albion Bridge Stewards were advised.

9

Aesthetics/Visuals:
According to **Section 30251 of the Coastal Act** the scenic and visual qualities of coastal areas shall be protected as a resource of public importance...Development shall be sited and designated to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible to restore and enhance visual quality..New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan ...and by local government shall be **subordinate** to the character of its setting. None of this is happening with this project.

According to **Mendocino LUP Policy 3.8-6** the vehicle lane and shoulder should achieve a 32 ft. paved roadway. I believe that the current Albion River Bridge (ARB) being 26 ft. wide is perfect for this setting. I can foresee adding on a 6 ft. cantilevered pedestrian and bicycle path on one side, or both

sides. Caltrans realized that the 55 ft. wide new bridge would not be approved by the Coastal Commission and now proposed a bridge of 47 ft., but this is still way too wide along this Mendocino County LCP designated Highly Scenic corridor. The wider this bridge is, the faster traffic is, and more severe accidents will happen. There has never been an accident on this bridge in all these years other than the logging truck that ended up breaking through the railing as a car hit him head on. Even a different railing would not have stopped a fully loaded logging truck. The historic world renown Bixby Bridge got a seismic retrofit in 1998 for $20 million has a 24 ft. paved roadway width. The argument that the ARB is **"functionally obsolete"** and therefore needs to be replaced is a mute argument when bridges such as the Bixby Bridge, the world famous Golden Gate Bridge, and most Highway 1 bridges have a roadway that is narrower than today's standards for shoulder width, pedestrian and bicycle lanes recommend.

10

According to **Mendocino LUP Policy 4.9-2** in order to maintain the special community character, building permits shall require that building materials, color, and architectural forms of new structures exposed to public view be similar to those of existing buildings. The renovated houses of the Albion village (south side) have been kept the way they were initially designed. It is totally out-of-place to have a brand new concrete bridge be 81% wider and have metal rails which do not allow view of the ocean. In fact the whole Albion village should be considered a historic village. The area is comprised of mostly uninterrupted rolling hills east of Hwy 1 and uplifted marine terrace bluff-tops west of Hwy1.

What happened to the idea to use the railings Caltrans used at Noyo Bridge and 10 Mile Bridge that Vincent Taylor fought so hard for during 12 years with Caltrans and the Coastal Commission? It is as if Caltrans has no interest or taste for beauty. Is it because the decisions are made in some office somewhere, other than seeing what fits in on site?

The Albion communities north and south of ARB are designated as "rural village" in the Mendocino County LCP. They are afforded special visual resource protection in the **Coastal Zoning Code (CZC) Section 20.504.020(C)**. A new, out-of-place bridge would be visible from the campground below, Albion Ridge Rd. above, while driving on it, but also from the ocean, and is protected by the California Coastal National Monument. The scenic beauty and important wildlife habitat within the Monument are protected by the Bureau of Land Management as National Conservation Lands. Along its length, this spectacular interplay of land and sea is an experience that creates lasting connections between people and nature. It is my understanding that due to that a new bridge could only be built one side at a time. https://www.blm.gov/programs/national-conservation-lands/california/california-coastal

Caltrans wants to destroy the historic, iconic 80 year old ARB and replace it with a new 81% wider, longer out-of-place concrete bridge that would cost between $126 and $135 million. The original cost was $370,000. In order to be able to build the ARB Caltrans had to tear down the church, a community hall, a logging company building on the northern end and a large barn owned by the Smith family on the south end. The ideal place for a bridge is where the bridge is now due to the unstable cliff side. To build all these ugly retaining walls turns what is an elegant, beautiful bridge into a very ugly bridge and all the area around would be an eyesore for years to come.

Caltrans wants to excavate South Albion head and North Albion Coastal Bluff and widen, relocate, and speed up Hwy 1 between Ledford House, south of the intersection with Spring Grove Road through the Albion Ridge Road intersection, within feet of the Albion River Inn and ultimately as a speedway from the Navarro Point Preserve to and beyond Dark Gulch.

Caltrans intends to remove the US- and State-designated historic and iconic, well-built, and resilient 80 year old ARB; the last timber trestle bridge on California's Hwy 1 and possibly the tallest trestle bridge in use in the US.

Caltrans shows different designs on their web page for a new, wider, and longer out-of-place concrete bridge with hideously large concrete block foundations, and horribly ugly 80ft. long, 70ft. wide, and 40 ft. deep concrete retaining walls that would not be buried and placed on the south facing and north facing rocks leading from the beach up to the ARB. This bridge would allow faster traffic over the "Wild and Scenic Albion River" and the highly scenic inner Albion Cove, Albion Cove beach, the Albion River bluffs, and historic site that is now the Albion Flat campground, marina, beach, and ocean. Build Alternatives **are not subordinate** to the Albion River/Valley Setting.

Section 30235 of the Coastal Act addresses issues in regards to retaining walls.

The **Visual Simulations** requested by the Coastal Commission **on pages 180-186 of the Community Impact Assessment** show clearly how bad any new bridge would look with the concrete footing/foundation stuck in the river that supports the Steel Truss. I think that only in the United States an agency like Caltrans has the heart to ruin/destroy an absolute gem and turn it into a soulless monster by ruining nature, the economy, the coastal community and much much more in order to benefit them and their employees. In Europe they value brilliant engineers like the Romans, the Swiss civil engineer Robert Maillard, the French civil engineer Gustave Eiffel's work, good workmanship, and pay to properly repair and maintain them and even include them on UNESCO's world heritage site.
Robert Maillart, a Swiss civil engineer's crucial innovation was to integrate a bridge's arch and roadway into a form called the hollow-box arch. The result was that bridge loads would be carried by the three segments of the hollow-box: the deck, arch and walls. His next innovation was to develop the deck-stiffened bridge after an analysis of the effect of live loads when they are added to a dead load. Using reinforced concrete, Maillart was able to build bridges which were aesthetically very pleasing and structurally sound. Salginatobel Bridge is a reinforced concrete arch bridge designed by Swiss civil engineer Robert Maillart. Gustave Eiffel, French civil engineer, designed the elegant Garabit viaduct and the Eiffel tower. The Pont du Garre, an ancient Roman aqueduct in France. Why can not Caltrans do that? Why is Caltrans determined to ruin a beautiful bridge?

11

Air Quality: DEIR/DEIS contains no construction and build alternatives life cycle dust/fumes distribution analysis, and no mitigations. With more people suffering from asthma, and allergies dealing with bad air, being stuck in traffic on hot and sunny days, the rehabilitation would have a smaller footprint compared to building a new bridge. See **Air Quality Report pages 25-28**.

12

Biological Resources: DEIR/DEIS omits description, analysis of baseline biological conditions prior to Caltrans habitat modifications, and related, proportionated, assured mitigation measures to offset significant direct, and cumulative impacts.

The shade caused by a new 81% wider and longer bridge would destroy the Albion River flora & fauna (especially the eelgrass). See **The Importance of Eelgrass by West Coast Regional Office**. According to the new policy biologists will help federal agencies mitigate for unavoidable impacts and create 20% more eelgrass habitat than was destroyed. Caltrans needs to do the same.
https://www.fisheries.noaa.gov/feature-story/importance-eelgrass

13

Section 30240(a) of the Coastal Act addresses ESHAs. ESHAs are a big concern, as well as wetlands. The **least environmentally-damaging feasible allternative** is to rehabilitate the ARB. Waste water discharge is another concern.

Wetland compensatory mitigation credit would not be necessary if ARB would be rehabilitated.

On-site mitigation might be infeasible for certain plants.

Section 30230 and Section 30231 of the Coastal Act address issues of water quality and wetlands.

14

A new bridge would cause much damage to the **Wild and Scenic River** (for 3 miles); and to the eelgrass that supports the salmon and steelhead. A new much wider concrete bridge would create shade not only to the eelgrass, the beach, the berm, the dunes, and the campground which serves recreation for people with low income. The eelgrass is the best in this area between Humboldt County and further south of here. Also there are issues in regards to the estuary and tides. The logging industry created erosion and increased sediment which has caused high levels of turbidity, increased water temperature and limited fish. Adding to this scenario is the problem connected to noise and lights at night to help with the demolition of the current bridge and construction of the new bridge. Caltrans intends to use water for construction by de-watering (using toxic water) to build a new bridge. The fact is that the southern portion of the campground is on top of wetlands. The pumping of water and reusing it (dewatering) for the project would be killing fish fry, insect larvae, krill, etc., whatever else is in the water. Little water bears are supporting the salmon and steelhead. They live in the hyporheic zone, the region of sediment and porous space beneath and alongside the Albion River where there is mixing of shallow groundwater and surface water. The land that would be denuded of small vegetation to make room for staging areas for equipment and materials, and the construction of haul roads would only create more erosion and increased sediment.

The DEIR/DEIS omits description, analysis of the construction phase and build alternatives operational polluted stormwater drainage system, stream diversions (Albion River, unnamed drainage near Hwy 1-Albion-Little River Road intersection, unnamed drainage near the Hwy 1-Albion Ridge Road intersection), dewatering impacts on Albion Flat hyporheic zone (a critical component of the Albion River juvenile salmon/steelhead estuarine system).

A recent Sonoma County lawsuit (*Russian River Keeper v Sonoma County*) establishes important findings of fact and law about the limitations on extraction of "groundwater" where it flows adjacent to a river, akin to the Albion Flat gravels hyporheic zone next to the Albion River.

15

Caltrans did not revegetate the north west end of ARB as promised after the geotechnical investigation, or removed the invasive weeds. What makes one think that Caltrans would now be dealing with invasive plants that will be brought in during construction. The Albion Bridge Stewards did it. Caltrans did not replace the guardrail so tourists would not park there and cause an accident. Many BIRIS bridge reports indicated that the ARB could not be analyzed as poison oak or steep terrain prevented workers from checking the ARB. The public never got to see the results from the geotechnical investigation even after asking for a PRR. In fact the boring samples were left behind exposed for 2 weeks during rain and wind between X-mas and New year.

16

Climate Change No valid mitigations to offset significant direct, cumulative GHG impacts from construction, operation of wider, faster Highway 1. The sea level analysis is speculative.

17

Community Character: Building alternatives are inconsistent with rural Albion.

18

Cultural Resources: DEIR/DEIS omits description, analysis of preservation of existing historic ARB alternative and of Native American cultural resources.

The destruction and "replacement" of the historic/al ARB is inconsistent with numerous requirements of the California-certified Mendocino County LCP, the Coastal Act, the federally-approved California Coastal Management Program, and State and US historic/al preservation law, and is highly controversial.

The ARB is significant as the structure is associated with events that have made a significant contribution to the broad patterns of our history; and the structure embodies the distinctive characteristics of a type, or method of construction or that represent the work of a master or that possess high artistic values and it retains historic integrity to convey its engineering significance. Also the ARB is significant as it is one of the last remaining "well- engineered" timber bridges in California, and probably in the U.S. and represents a significant and distinguishable entity whose components may lack individual distinction. Due to these reasons the ARB was listed in the National Register of Historic Places and the California Register of Historical Resources.

Section 106 requires Federal agencies to take into account the effects of their undertakings on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. In addition, Federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices (SHPO). **Page 2 in the Appendices lists the need for a Memorandum of Agreement, while on page 17 Caltrans indicates that they would be entering into a Programmatic Agreement with SHPO.** What will happen?

The ARB was identified and assessed in the APE. A federal undertaking is considered to have an **adverse effect** when any aspect of an undertaking meets one or more of the Criteria of Adverse Effect. As stated in **Section 1O6** regulations **36 CFR 36 CFR 800.5(a)(2)** examples of adverse effects include: Removal of the property from its historic location; change of the character of the property's use or a physical features within the property setting that contribute to its historic significance; and neglect of a property which causes its deterioration. Caltrans has caused adverse effects by neglecting to do regular appropriate repair and appropriate maintenance.

According to **5028 (a)** no structure that is listed on the National Register of Historic Places, on the California Register of Historic Places, or on any local public register of historic places, and that has been damaged due to a natural disaster, including, but not limited to, an earthquake, fire, or flood, may be demolished, destroyed, or significantly altered, except for restoration to preserve or enhance its historical values, unless the structure presents an imminent threat to the public of bodily harm or of damage to adjacent property, or unless the State Office of Historic Preservation determines, pursuant to subdivision (b), that the structure may be demolished, destroyed, or significantly altered.
(b) Any local government may apply to the State Office of Historic Preservation for its determination as to whether a structure meeting the description set forth in subdivision (a) shall be demolished, destroyed, or significantly altered. That determination shall be based upon the extent of damage to the structure, the cost of rehabilitating or reconstructing the structure, the structure's historical significance, and any other factor deemed by the State Office of Historic Preservation to be relevant. In making that

determination, the State Office of Historic Preservation shall consider the recommendation made by a team selected by the State Office of Historic Preservation, composed of three residents with historic preservation expertise who reside in the affected county. The determination of the State Office of Historic Preservation shall be issued no later than 30 days after the structure was damaged, or 30 days after the receipt of the application, whichever occurred later. (Added by Stats. 1989, 1st Ex. Sess., Ch. 3, Sec. 6. Effective November 7, 1989.)

There are two stand-alone programs dedicated to bridge projects. The Bridge Replacement, Rehabilitation, Preservation, Protection, and Construction Program, as well as the Bridge Investment Program. There is also a Bridge Formula Program. All help with funding. There are also other program sources of bridge funding as well as new Non-bridge Programs that can assist bridge projects.

19

Energy: The DEIR/DEIS omits cumulative impact analysis of concrete manufacturing for build alternatives, total energy demand comparison for all build alternative components, and bridge preservation. The Energy Analysis Memorandum discusses the significant energy consumption required for constructing a new concrete bridge **(Energy Analysis Memorandum pages 3-5)**.

20

Geology, Soils: The DEIR/DEIS omits Caltrans' geotechnical study report from the 2018-19 investigation; Albion River and Albion Cove bluff slopes have a history of instability; proposed bluff **stabilization is not the least environmentally damaging alternative**.

21

Greenhouse Gas Emissions: No valid mitigations were explained to offset significant direct, cumulative GHGimpacts from construction, operation of wider, faster Hwy 1.

22

Hazards: The proposed bluff stabilization might not work. Build alternatives **are not the least environmentally damaging alternative** to mitigate identified geologic, seismic, highway intersection-curve hazards. Geologic instability is an issue that is addressed in **Section 30253 in the Coastal Act**.

23

Hazardous Materials: Concrete for Build Alternatives is a hazardous material. The DEIR/DEIS contains no analysis for keeping it out of wild/scenic estuarine Albion River, Albion Cove, Albion Cove Beach, Albion Flat recreational area, including during deconstruction of the existing bridge.

This bridge has been holding up that well do to its amazing workmanship, good maintenance for years (but not since 1990) and the use of 1st growth Douglas fir and the wolmanizing treatment it received, which is only an issue if torn down. It would need to be hauled off to a Superfund site. If left alone it has not affected the land use unless someone would live 24/7 underneath the ARB. Caltrans did not indicate how many trucks it would take to drive the treated lumber from ARB to a Superfund site and also did not indicate how much that would cost. We do not know how workers would be protected and how the Wild and Scenic River, the fauna and flora would be protected.

Section 30232 of the Coastal Act address the problems with oil, gas, petroleum, and accidental spills.

24

Hydrology, Water Quality: The DEIR/DEIS omits description, analysis of the construction phase, build alternatives of operational polluted stormwater drainage system, and stream diversions at Albion River. It does not name the drainage near Hwy 1-Albion-Little River Road intersection, nor another drainage near the Hwy 1-Albion Ridge Road intersection. Impacts on Albion Flat hyporheic zone is a critical component of the Albion River juvenile salmon/steelhead estuarine system.

Section 30230, 30231, and 30232 of the Coastal Act address issues of water quality. The chromium and arsenic from demolishing the ARB could greatly endanger plants, animals, and people.

25

Land Use and Planning: The build alternatives are inconsistent with the development subordination requirement of Coastal Act §30251, LCP Policy 3.5-1, including as contained in the federally-approved California Coastal Management Program, which renders the BA's infeasible. There will be highway and navigable Albion River blockages during 4-6 years of construction. Bridge deconstruction would have a significant, unmitigated direct and cumulative adverse
effects on protected priority public health and safety, recreational and commercial fishing access.

26

Noise, Vibration: Construction of build alternatives would generate a suite of industrial noises from numerous clearing, grubbing, earthwork, pavement, bridge construction, (daytime?) pile driving during 1-2 construction years, and bridge deconstruction sources, estimated as 94 dBA (max) for residences between early morning and night times and 101 dBA from pile driving (see DEIR/DEIS Table 40 for generalized disaggregated equipment details per US FHWA); however, the DEIR/S does not describe or analyze peak or sustained noise levels from cumulative equipment operations and during varied wind conditions in Albion River Valley, Albion River, Albion Cove, North Albion Village, South Albion Village, at Ledford House and Mendocino Coast Lodge, or in Albion generally; pile driving would occur within 115 feet and 380 feet of existing residences; operational project noise generation analysis in the DEIR/DEIS is superficial and speculative.

There would be acoustic impacts from pile driving on fish and other species, as well as people. As the Salmon and Steelhead are both protected under the Endangered Species Act rehabilitating the ARB would be much safer. See Noise Study Report pages 20-24.

Caltrans would fill the natural swale - with wetlands and unstable ground - to build a whole new road berm between scalped North Albion coastal bluff and the Albion River Inn, while extending the North Side Albion River Road on the existing road into a new Albion Little River Road intersection with Hwy 1. Caltrans would turn our quiet, rural, environmentally sensitive coast into a noisy, polluted, out-of-place, and dangerous speedway.

27

Population, Housing: The DEIR/DEIS omits description and analysis of all population segments that the build alternatives would affect, including recreational visitors (campers, diners, sight-seers, beach users, boaters), fishers, residents, workers in the commercial recreational facilities, and of current housing (rental, vacancy) conditions in Albion and coastal Mendocino County between the Navarro River and Pudding Creek.

With the acute shortage of affordable housing in Mendocino County mentioned in the Community Impact Assessment I can not fathom where Caltrans workers would sleep with all of the local motels, hotels, Airbus's full during the summer months.

Rehabilitating ARB could be done by employing the many very qualified woodworkers this area has.

28

Recreation: Construction would permanently or intermittently block public recreational access and use of the Albion Flat campground, Schooner's Landing, Albion Beach, Albion Cove and the Pacific Ocean from the Albion Flat marina, likely of Ledford House and

Mendocino Coast Lodge, and substantially interfere with recreational access along Highway 1 to public and commercial recreational facilities in Albion and adjoining upcoast coastal Mendocino County. The DEIR/DEIS omits a terrestrial and river transportation/construction plan that would further quantify these blockages and mitigations, including build alternatives.

The protected pocket beach where parents feel that their children are safe and the whole family could feel the sunshine would drastically change (no more sunshine) with an out of place, horribly ugly new almost twice as wide concrete bridge.

Section 30212 of the Coastal Act deals with public access to the shoreline which even now is hampered, but would not be an option once construction would start.

Section 30224 of the Coastal Act deals with commercial fishing and recreational facilities. The chances for these activities to happen during construction of a new bridge would be very slim.

29

Transportation/Transportation: The DEIR/DEIS omits a detailed, quantified construction traffic management plan for the build alternatives and the proposed bridge deconstruction, generally describes likely repetitive extended lane and full bridge closures, as well as river closures, during the 4-6 year project period, and provides no substantive (related, proportionate, public interest) mitigations for these significant adverse impacts. The DEIR/DEIS also does not provide current transportation data or analysis regarding any need for the build alternatives. Extrinsic data indicates that no such need exists - other than that Caltrans wishes, contrary to law, to not maintain the existing historic bridge.

The effects of widening the Albion River North Side Road to allow two dump trucks to pass on the road and the realignment of the Albion River North Side Road to join the Albion Little River Road before intersecting Hwy 1 would be quite disruptive to the north bank Albion neighborhood.

30

Caltrans would excavate South Albion Head and North Albion coastal bluff and widen, relocate, and speed-up Highway 1 between the Ledford House, south of the intersection with Spring Grove Road, through the Albion Ridge Road intersection, within feet of the Albion River Inn, and ultimately as a speedway from the Navarro Point Preserve to and beyond Dark Gulch. It would take anywhere from 3-5 years to build this bridge costing $126 to $135 million (2024 estimate).

The Initial Site Assessment pages 2-4 addresses the difficulties that dealing with a construction site for 3-5 years would entail.

Tribal/Cultural Resources: Proposed bluff stabilization is **not the least environmentally damaging alternative.** American cultural resources in the build alternatives site and on that basis also fails.

31

Utilities, Service Systems: The DEIR/DEIS neither describes nor analyzes a storm water control system for the build alternatives or extraction of water from the Albion Flat hyporheic zone. The project relies on limited local water supplies, and importation of water for construction in chronically water-short coastal Mendocino County constitute a significant adverse project erect on the environment and sensitive species that render the built alternatives infeasible.

32

Wildfire: The DEIR/DEIS finding of no project impact on Albion-Little River FD fire protection services is unsupported by analysis of a site-specific staging area plan for the proposed

staging area between Highway 1 and the South Albion Village commercial core.

33

The DEIR/DEIS did not analyze the **Socioeconomic Effects** this project would have. As the census added houses north of the ARB with houses in the Dark Gulch area they were not counted. I also believe that the Albion Ridge Rd. and the Navarro Ridge Rd. were not counted as all I read was information about the rich people. Albion has many low income and elderly people. Just counting how many are attending the food bank weekly in Albion would make it clear, but Caltrans would need to actually come here to see or talk to the food bank. Albion also has people from various ethnic backgrounds. They were glossed over. People in Albion can not afford the rents (if there are any) in Mendocino. With homeowner's insurance raising steadily, gas prices as well, and electricity rates going up constantly a project like this might be the deciding factor that would be the last straw that breaks the camel's back. As it is business owners ever since Covid can not find reliable workers and with difficulties due to traffic problems this will further worsen the situation. See also **Community Impact Assessment pages 14 -17**.

34

Possible Mitigations:
An adequate mitigation in case Caltrans has deaf ears to everyone's comments could be the purchase of a parking area and kayak launch (no motors) at the banks of the Albion River, as well as restoring the Albion River to pre logging condition and planting additional eelgrass for the length of the Wild and Scenic River, as well as creating a lookout area on the west side of Hwy 1 (like Pomo Park).
Having photos of the historic ARB and online interactive information is not a mitigation.

35

Cumulative issues are addressed in the **Community Impact Assessment**. They would be severe with construction zone from the Albion River Inn to the Navarro Point Preserve including also the work on the Lead Abatement in the Salmon Creek area, a possible new Salmon Creek Bridge, the Drainage and Safety projects south of there which were not mentioned, pavement project at Albion Little River Road, as well as work at Jack Peters Creek Bridge and Elk Creek Bridge. All these jobs bring money for Caltrans and prevent locals to work. In addition tourists will not come here which for an area that survives from tourism does not work.

Sincerely, Annemarie Weibel
member Albion Bridge Steward

From: Annemarie
To: albionbridge@DOT; Everett, Katie@DOT; Walker, Liza M@DOT
Subject: additional comments about DEIR/DEIS, in regards to Albion River Bridge
Date: Wednesday, October 9, 2024 4:55:34 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

To Liza Walker,

Please accept my comments. Thanks, Annemarie Weibel

Additional comments about the DEIR/DEIS for the Albion River Bridge

36

I am a mother, grandmother, educator, landowner, and taxpayer. I have lived in Albion since 1983. I am a member of the Albion Bridge Stewards. It is not legal that during the scoping meeting on 5-5-2022 you wanted input on the Albion River Bridge (ARB) Replacement/Rehabilitation Project and now in your DEIR/DEIS propose the removal of the ARB. While residents were believing all along that Caltrans was still considering to rehabilitate the bridge and finish the seismic retrofit of the timbers Caltrans informed Native American tribes and various agencies ever since 2015 that they are considering replacing the bridge, looking for alternative designs to replace it, mentioning the bridge replacement project without informing the public that they already made up their mind. See electronic pages 94, 101, 104, 162,…. https://www.albionriverbridgeproject.com/resources/appendices/

37

To top off this situation you scheduled an informational meeting for September 26 via Webex (not zoom) where people had to realize that they needed to download, and install Webex, approve the installation, and make sure that cookies would not be a problem. That is a lot to ask from this community where many have no computer, no Wi-Fi, and/or not the skills that it takes to deal with that. As you recall the Albion Bridge Stewards asked you for an in person hearing (not a meeting), asked it to be three hours long, and when you refused, we informed you that we needed to be able to all meet in a central location with the technical help of your IT department, so glitches like we had would not happen. Allowing the public to talk for two minutes when the focus has changed to Rehabilitation Alternatives is not enough time. It also is not enough to give each speaker 1 turn, as many comments from various people were not true and there was no chance to comment on them. Also two people that tried to talk were not able to. This might not have happened with a zoom meeting. Norbert Dall and Alex de Grassi could not connect. Alex de Grassi as he mentioned at the August 13 meeting at the Grange in Albion lives part time next to ARB. He and his wife Alison also run a vacation facility. Not only are they very concerned about the visual effect, the noise, the dust, the 3-5 year construction site all around them, but also the loss of income at their vacation rental. So far Caltrans has not offered to pay for that. I am aware of another neighbor that also lives right next to the ARB and is in the same situation as far as vacation rental is concerned. In short the 90 minutes of evasive, self-serving fear mongering intended to scare people into believing the historic bridge *must* be replaced is not what the Coastal Act that is clear that the public needs to be able to have the widest opportunities possible to participate in this process. This has not happened!

38

Mr. Ryan O'Dell that works for structure maintenance and investigations mentioned at the virtual meeting that the harsh marine environment is not helping the ARB. Why did we not hear from a licensed engineer? Even the approx. 300 foot long concrete Carola Bridge over the Elbe River, in Dresden, Germany collapsed as we found out this September. Dresden also has an oceanic climate. The collapse may have been caused by corrosion due to chlorides. https://www.diesachsen.de/en/various-news/carola-bridge-dresden-possible-cause-of-the-collapse-and-history-2954124

Closer to home we find out that the final environmental document is available for the District 5 replacement of the Limekiln Creek Bridge on Highway 1 in Monterey County. Irreversible damage caused by chloride intrusion from pervasive salt-laden fog has accelerated the deterioration of both the superstructure and substructure of Limekiln Creek Bridge, resulting in frequent spalling, cracking, and corrosion of reinforcing steel.

39

It appears that chloride intrusion and the salt-laden fog accelerated the deterioration of concrete. That would seem to argue for a timber structure in such conditions. This project would result in a four-year closure of an entire state park! https://dot.ca.gov/caltrans-near-me/district-5/district-5-current-projects/05-1f510

Would that not make us want to look into saving $126 to $135 million and investing this money into rehabilitation of ARB and including the **seismic retrofit** that was not mentioned in the power point presentation for the virtual September 26 informational meeting.

The state of Minnesota has a Manual for Repairs of Timber Bridges: Cost-Effective Timber Bridge Repairs. The University of Minnesota also published a cost-effective, durable alternative for timber based bridges. If Minnesota can do it, so can we in California.

Obviously Caltrans does not have much experience maintaining historic timber trestle bridges and does not consult with any who have that knowledge. The licensed engineers Dr. Ben Brungraber and Dr. Dick Schmidt (both are P.E.'s and have a Ph. D. submitted their analysis of ARB to Caltrans in 2018. They offered their services and were not taken up on it. They also listed that checks do not need to be filled. By using **epoxy that promotes moisture** Caltrans has helped the bridge to deteriorate.

These engineers also wrote that:"Many of the large timber members have checks – radial cracks on the surface of the timber. The checks tend to be aligned with the longitudinal axes of the members, which suggests that the members have remarkably straight grain, another indication of high- quality material. Checks are not generally regarded as strength-reducing defects and do not require repair. Checks on the sides or bottoms of horizontal members and on any face over vertical or diagonally oriented members are able to drain freely when subjected to rain water. With proper drainage detailing, the bridge deck also acts as a roof to protect the superstructure and trestle towers from stormwater runoff." https://savehighway1.org/2018/09/11/remarkably-good-condition-read-the-independent-engineers-report/ Unfortunately Caltrans does not regularly and properly clean the bridge, so that scuppers get plugged causing the water to run down the side of the bridge and cause rot. Potholes are not getting fixed in a timely manner and the railings have not gotten a fresh paint job in a long time.

World famous engineer A. Astaneh-Asl, Ph.D., P.E.,M.ASCE indicated in **Preservation of a Historical Timber Bridge in California** that the corroded bolts need to be replaced by better galvanized, zinc coated modern bolts and covered with plastic to be protected from corrosion. https://ascelibrary.org/doi/10.1061/9780784481332.016

The letter you received from A. Astaneh-Asl, Ph.D., P.E.,M.ASCE clearly explains that yet again (like in 2018) your analysis of what is happening in regards to Deck, Superstructure, and Substructure condition ratings does not gel. See Dr. Astaneh Letter to Albion Bridge Stewards from September 9, 2024 that was forwarded to you on September 9 and is also visible here: https://savehighway1.org/2024/09/09/caltrans-bridge-inspection-report-contains-severe-problems-world-class-structural-engineer/

Just this week Caltrans had to deal with a pothole at the south end of the ARB which members of the Albion Bridge Stewards informed you about several times since 2019. Caltrans ended up also filling some other potholes. In 2017 the public was informed that about 12-24 in. in from the edge of the deck the timber is not solid anymore. Caltrans has not cleaned the

scuppers regularly and properly and allowed rainwater to soak into the timber below. The expanded pothole was caused by the failure of the poor patching job. Clearly Caltrans would have seen how the scuppers and curb (and guardrail) badly need cleaning and maintenance.

40

The slide that you showed at the September 26 virtual meeting did not include the seismic retrofit that was proposed in earlier proposals for rehabilitation. See 32.25 min. It lists several items that would need replacing, repairing, installing, and widening, but does not mention the seismic retrofit.

The online survey did not include a chance to vote for a no building option. Even a no build option includes repair and maintenance.

The non permitted archaeological investigations already threatened the ARB as even replanting the area with ice plants was not successful. Storm surges and high tides now soak the berm and threaten the ARB. A bench that was placed right on that spot further allows tourists to ruin the berm by climbing up to the top of the berm.

Please read why the ARB was listed as a historic bridge. See application by engineer A. Astaneh-Asl, Ph.D., P.E.,M.ASCE and John Johansen (Albion architect).

Expanded public access is a must regardless what happens in this area. Please rehabilitate the ARB and create a cantilevered bicycle and pedestrian area.

Sincerely, Annemarie Weibel

Response to Annemarie Weibel

1. Replacement and rehabilitation options were discussed during the 2022 public scoping process. However, the bridge rehabilitation options were considered and eliminated from further analysis for failure to meet most of the basic project objectives. Reasoning for elimination of the rehabilitation options is provided in the environmental document (ED) (see Sections 2.5.5 and 2.5.6, and Appendix I, *Consideration of Rehabilitation Alternative*). The replacement options were pursued as they would achieve the basic project objectives.
2. The ED was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/ Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   The environmentally superior alternative is identified in the ED as Design Option 2B. See ED Section 2.3.1, *Environmentally Superior Alternative*. This option has been identified as the preferred alternative.
3. The ED identifies that the Albion River North Side Road would be improved (e.g., widened) to allow for better access; the existing roadway and anticipated improvements were included in the proposed project's Environmental Study Limits (see Figure 3 in Section 2.1, *Project Description*). In addition, see Master Response 1 (Rehabilitation) in regard to impacts from rehabilitation.
4. An accurate depiction of the history of the bridge is included in the ED (see Chapter 1.3, *History*).
5. The ED includes references to the 2021 and 2022 Bridge Inspection Report, both of which rate the superstructure and substructure condition as 4-Poor.
6. The structural deficiencies of the existing bridge include a substandard live load carrying capacity, non-compliant bridge safety rails, and a steel deck truss that lacks redundancy in its design and would be incapable of carrying loads across the bridge if damage occurred at one or more of its steel members (i.e., is fracture critical). These deficiencies cannot be addressed through routine bridge maintenance. It is noted that the terms identified in FHWA's *National Bridge Inspection Standards* and the *Recording and Coding Guide for the Structure Inventory and Appraisal of the Nations Bridges* have changed over time. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.
7. Both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) require consideration of a No-Build (No Action) Alternative. As identified in the ED, under the No-Build Alternative, the proposed project would not occur, and the existing bridge would remain in its current condition. See Section 2.2.1, *No-Build (No Action) Alternative*.

The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

8. A Value Analysis Study was completed in 2013 in accordance with Caltrans' Project Development Procedures. Although a potential update to the Value Analysis Study may have been discussed in 2017, it was determined not to be necessary and, therefore, no subsequent value analysis was performed. Details regarding the 2013 Value Analysis Study are provided in the environmental document (see ED Chapter 2.5, *Alternatives Considered but Eliminated from Further Discussion*).

9. The Build Alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.8-6 and other Policies stated in Table 9 in Section 3.2.2, *Consistency with State, Regional, and Local Plans and Programs.*

   The Albion River Bridge is functionally obsolete because it does not meet minimum design standards due to the narrow deck geometry. This deficiency was one of many functional, safety, and structural deficiencies identified in the ED as the project need (see ED Section 1.4.2, *Need*). The replacement bridge deck for all Build Alternatives would be 47 feet wide with 12-foot-wide travel lanes, 6-foot-wide shoulders, and a 6-foot-wide, separated pedestrian walkway. All Build Alternatives would also widen the roadway shoulders on SR 1 to 4 feet within the project limits consistent with the Mendocino County Coastal Element, which would transition to 6 feet wide on the bridge approaches.

   The proposed project would improve the function and geometrics of the Albion River Bridge and approach roadway to provide uninterrupted traffic movement in the event of a collision or emergency incident, seismic event, or other catastrophic failure. The proposed project would improve traffic flow with upgrades to the bridge approaches by widening the shoulders, lengthening the existing Spring Grove Road/Albion Ridge Road two-way left turn lane, and improving site distance; thus, improving safety and reducing the potential for accidents and collisions on and in the vicinity of the bridge. The proposed project would also improve access and safety on the bridge by providing a separated pedestrian walkway and widened shoulders for cyclists.

   The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

10. A comprehensive environmental analysis for the proposed project was completed. Standard measures, avoidance and minimization measures, and mitigation measures were identified to reduce impacts. Mitigation measures include **AMM-AR-1** through **AMM-AR-3**, which require aesthetic treatments to

the bridges, guardrails, and retaining walls be included to address context sensitivity, and **AMM-CR-3**, which addresses the adverse effects to the Albion River Bridge. These mitigation measures would lessen the impact to aesthetics and cultural resources but would not reduce the impact to a less-than-significant level under CEQA.

After consideration of public and agency comments, Design Option 2B has been identified as the preferred alternative. Design Option 2B is an arch design, which would allow for expansive views beyond the bridge, with the arches framing the view of the river cove beneath them. The arch design is consistent with other bridges along the SR 1 coast. The separated pedestrian walkway on the west side of the bridge would allow a safe, dedicated area to enjoy enhanced views of the ocean.

11. The ED assessed impacts to air quality; impacts to air quality would be less-than-significant under CEQA and mitigation is not required.

    For additional detail regarding bridge rehabilitation and air quality, see Master Responses 1 (Rehabilitation) and 9 (Air Quality).

12. The draft ED discussed baseline biological conditions in the *Affected Environment* subsections of Section 3.4, *Biological Environment.* Impacts to biological resources are discussed in the *Environmental Consequences* subsections, and cumulative impacts are discussed in Section 3.7, *Cumulative Impacts.* These sections also discuss project features, standard measures, as well as additional measures that would be used to avoid, reduce, and offset impacts on biological resources. See also Section 4.3.4, *Biological Resources,* for an assessment of impacts under CEQA. Additional detail on baseline conditions and impacts is included in the Natural Environment Study (NES) prepared for the project.

    Impacts to eelgrass were assessed for the Build Alternatives, including shading. Under the identified preferred alternative (Design Option 2B – East Arch), no permanent impacts to eelgrass are anticipated. Further, removal of the majority of the piers from the existing bridge would increase available habitat and may improve the estuary function by creating more natural hydrological conditions.

13. With respect to mitigation associated with bridge rehabilitation, rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

    The ED identifies feasible mitigation measures for impacts to wetlands and waters habitats, including implementation of a project-specific Revegetation Plan that utilizes regionally appropriate native plants (see **AMM-AR-4**). The ED also assesses impacts to water quality, which are less than significant under CEQA.

14. With regard to eelgrass, see Response 12 above. Areas of temporary disturbance associated with staging areas and haul roads would be restored following completion of construction. The proposed project would implement a

site-specific Stormwater Pollution Prevention Plan, which would include construction site BMPs to control sedimentation, erosion, and potential chemical pollutants.

The proposed project would include standard temporary water pollution control, permanent design pollution prevention, and post-construction treatment BMPs as described in Standard Measures **WQ-1** and **WQ-2**, and Section 3.3.2*, Water Quality and Stormwater Runoff*, to avoid substantial decreases in groundwater supplies and substantial interference with groundwater recharge.

Shallow groundwater encountered may be collected during construction activities. Several options are available for use or disposal of the collected groundwater, including use for dust control, upland disposal, disposal at a publicly owned treatment works, or discharge to surface waters, some of which may require separate permitting and agency coordination. Dewatering of groundwater during construction may be necessary in areas of deep excavation, removal of existing piles and footings, and installation of the spread footing. These activities could result in a temporary drawdown in groundwater, which could temporarily disrupt or alter baseflow in the immediate area. Because this work would only be performed during construction, the groundwater baseflow and quality would return to pre-construction conditions once the dewatering activities are completed. If it is proposed that the project would discharge to receiving waters during potential dewatering operations, Caltrans would obtain the appropriate permit and approval from the North Coast Regional Water Quality Control Board (NCRWQCB) as stated in Caltrans' *Field Guide to Construction Site Dewatering*. No groundwater well or other permanent supply well would be developed.

15. A project-specific Revegetation Plan would be implemented that utilizes regionally appropriate native plants (see **AMM-AR-4**).

    Geotechnical investigations are conducted to provide recommendations for specific foundation design and earthwork construction. A design-level geotechnical report for the preferred alternative (Design Option 2B) will be prepared in the design phase of the project.

16. A cumulative impacts analysis was prepared, and no significant cumulative impacts were identified for greenhouse gas emissions (see ED Section 3.7.3, *Cumulative Impact Analysis*). Sea level rise was considered in the development of the Build Alternatives. Sea level rise is assessed in the draft Final Hydraulic Report, using guidance from the 2018 Caltrans and Ocean Protection Council SLR Guidance Manual. "Medium-High Risk Aversion" values are used per the permit requirements from the California Coastal Commission.

17. All Build Alternatives would replace the existing bridge with a modern bridge structure that meets current design and safety standards. For some residents, replacing the existing historic bridge would change their perception of their sense of place and community history due to the local importance of the existing bridge. As described in ED Section 3.2.11, *Cultural Resources*, Caltrans consulted with the State Historic Preservation Officer and consulting parties to identify treatment

measures for loss of the existing bridge (see **AMM-CR-3**). These include historic bridge recordation, an interpretive exhibit, a short documentary film, and scale model of the Albion River Bridge.

The proposed project would not divide an existing community or create barriers to access. Currently, residents drive over the bridge to reach community services, businesses, and neighbors on each side of the river. The existing bridge lacks shoulders for pedestrians and bicyclists, and the bridge does not meet modern seismic safety standards. All Build Alternatives would add shoulder width and a separated pedestrian walkway across the bridge, which would provide long-term benefits for community cohesion by providing safe and reliable multimodal access across the Albion River.

The proposed project would not distract from the rural scenic characteristics of the present roadway. All Build Alternatives would maintain a two-lane, scenic rural highway once construction is complete consistent with the Local Coastal Plan.

18. The Albion River Bridge, which is listed in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR), would be directly impacted by the proposed project. Measures to mitigate significant impacts to the Albion River Bridge would be included in the Cultural Resources Management Plan, along with other measures agreed to in the Phased Programmatic Agreement, which would be developed under Stipulation XII.A of the *Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the United States Army Corps of Engineers' Sacramento District, San Francisco District, and Los Angeles District, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act as it Pertains to the Administration of the Federal-Aid Highway Program in California* (2024PA). Changes to the Albion River Bridge remain substantial and adverse even with the implementation of mitigation measures, as the bridge would be replaced.

19. Many energy users contribute indirectly to the energy consumption of a transportation system, but these are difficult to reliably quantify at the individual project level. These energy users include those that refine raw materials into products such as vehicles or roads; explore for and refine oil into various fuels; construct and maintain dams, power plants, transmission lines, fuel distribution systems, train stations, and airports; and many others. Such factors are often studied in energy life cycle or carbon footprint analyses. These considerations are important to acknowledge; however, attempting to characterize or quantify these factors at the project level is generally speculative and of little use to decision makers. As such, these factors are outside the scope of the project-level transportation energy analysis.

    The environmental document determined that rehabilitation of the existing bridge would fail to meet most of the basic project objectives. After thorough analysis,

and in light of the age and structural condition of the existing bridge, rehabilitation as a project alternative was eliminated from further review (see Appendix I).

The ED identifies that energy consumption would be less-than-significant under CEQA. For additional details related to energy consumption during construction, see Master Response 11 (Energy).

20. All Build Alternatives would install permanent shoring as a necessary safety element to stabilize excavations for equipment and worker access along the steep slopes around the new bridge foundations. In addition, the proposed project would be designed to minimize slope failure, settlement, erosion, and new earthen slopes would be vegetated to reduce erosion potential (see Standard Measure **GS-1)**. One of the criteria used to identify the preferred alternative was the landform change associated with bridge construction and stability of the northwest bluff. The identified preferred alternative (Design Option 2B – East Arch) has the least amount of landform change and does not propose construction on the northwest bluff.

21. A cumulative impacts analysis was prepared, and no significant cumulative impacts were identified for greenhouse gas emissions (see ED Section 3.7.3, *Cumulative Impact Analysis*).

22. For a discussion of bluff stabilization, see Response 20 above. Coastal Act Section 30253 is addressed in Table 9 in ED Section 3.2.3, *Coastal Zone.*

23. While cured concrete is not a hazardous material, construction of the proposed project would involve the transportation, storage, and use of common hazardous materials, such as fuels and oils, to operate construction equipment and vehicles. The transportation, handling, and disposal of these materials would be compliant with regulations enforced by the California Department of Toxic Substance Control's Certified Unified Program Agencies and California Division of Occupational Safety and Health (Cal-OSHA). In addition, as described in ED Section 3.3.2, *Water Quality and Stormwater Runoff*, the implementation of standard BMPs would further reduce the potential of accidental release or exposure.

    Treated Wood Waste (TWW) from the bridge structure, utility poles, and guardrails would be generated, managed, and disposed of in accordance with measures described in Section 3.3.5, *Hazardous Waste/Materials*, including Standard Measures **HW-1** through **HW-4,** which would minimize potential impacts to human health and the environment due to accidental release of hazardous materials. To further lessen the potential impact of accidental release of hazardous materials, project-specific Measure **AMM-HW-5** would be implemented, which includes additional measures related to handling treated wood waste, including health and safety plan development and training.

    Coastal Act Section 30232 is addressed in Table 9 in ED Section 3.2.3, *Coastal Zone.*

24. The ED includes a description of hydrology and water quality conditions (see Section 3.3.1, *Hydrology and Floodplain*, and Section 3.3.2, *Water Quality and*

Stormwater Runoff). The proposed project includes the re-establishment of roadside drainages and culverts, which would be located and sized to accommodate anticipated surface runoff. Table 52 in Section 3.4.2, *Wetlands and Other Waters*, identifies culverts, drainages, and other aquatic features within the project area, and Appendix K, *Aquatic Resource Impact Maps*, includes maps of their locations. Potential impacts to salmon and steelhead habitat are discussed in Section 3.4.5, *Threatened and Endangered Species*, of the ED. For a discussion of temporary impacts from dewatering during construction, see Response 14 above.

25. The Build Alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.8-6 and all other Policies stated in Table 9 in Section 3.2.3.

    The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

    Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional details regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).

    The Albion River outlet would remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction).

26. The estimated 94 dBA Lmax level could occur at residences approximately 115 feet from impact pile driving for Design Option 2B. The referenced 101 dBA is at a standard reference distance of 50 feet; no residences are expected to be within 50 feet of the pile driving operation. Public access to the beach area under the Albion River bridge would be restricted during construction, which would prevent exposing the public to substantial construction noise during the use of the Albion River Campground. The estimated noise levels included for pile driving do not account for potential reduction from the proposed acoustic shielding.

    Construction noise is typically evaluated using the maximum root mean square pressure (Lmax) or an average hourly equivalent. The hourly equivalent noise level and Lmax were used to evaluate equipment noise for this project. The NSR was prepared consistent with the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (TENS). As sound propagates from the source geometric spreading, ground absorption, meteorologic conditions, and shielding have an effect on the received noise levels. The NSR considers the effects of geometric spreading to estimate construction noise levels. Evaluating metrological effects can be complex due to the variability in metrological conditions throughout the day. Metrological conditions can have a positive or negative effect on the received noise level. The TENS manual states that present

policies and standards assume zero wind for noise analyses. The NSR is believed to present an overall worst-case assessment of potential noise impacts, even with consideration of atmospheric effects (wind, etc.). This is because the construction noise evaluation does not include considerations for ground absorption or shielding effects.

Operational noise was evaluated following established procedures and includes site specific details to predict existing and future worst case hourly noise levels.

A vibration screening was conducted for the project. Predicted vibration levels were below the damage thresholds established in the Transportation and Construction Vibration Guidance Manual.

Acoustic impacts to special status species were assessed for the project; see ED Section 3.4.4, *Animal Species*, and Section 3.4.5, *Threatened and Endangered Species.* See also Section 4.3.4, *Biological Resources*, for a discussion of the level of impacts under CEQA. A comprehensive environmental analysis for the proposed project was completed; avoidance, minimization, and/or mitigation measures were included to lessen project impacts.

Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, including impacts associated with rehabilitation activities, see Master Response 1 (Rehabilitation). See also Response 9 above; the project is not a capacity-increasing project.

27. The ED includes an assessment of the community and community impacts that follow requirements and guidance set forth by CEQA and NEPA. The assessment considered factors such as population characteristics, age, housing, income, employment, commute patterns, and disadvantaged communities. See ED Section 3.2.6, *Community Character and Cohesion*. See also the Community Impact Assessment for additional detail.

    The proposed project is not anticipated to result in the need to construct new housing for construction workers. Construction workers may elect to stay in Albion, Fort Bragg, or other nearby areas, where they would commute to and from the construction site. Proposed construction activities would not contribute to changes in housing characteristics in the community of Albion or the rest of the Community Study Area.

    Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, including impacts associated with rehabilitation activities, see Master Response 1 (Rehabilitation).

28. The proposed project would not permanently block public access to the referenced amenities and, pending right of way negotiations with the Albion Campground, certain Albion Campground facilities may remain open to visitors (at the owner’s discretion). Visitors would use the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives*, or by watercraft

through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction). See also Table 9 in ED Section 3.2.3 for a discussion of consistency with the California Coastal Act.

29. As noted, a Transportation Management Plan would be prepared for the project in accordance with Caltrans' Transportation Management Guidelines. The anticipated project is anticipated to last 3 years for the identified preferred alternative, Design Option 2B and traffic control for the project is standard and similar to traffic control associated with other Caltrans projects. Impacts to transportation were fully analyzed in the ED and were determined to be less-than-significant under CEQA; therefore, no mitigation is required.

    For additional detail regarding the construction duration and traffic impacts, see Master Responses 2 (Construction Duration) and 7 (Traffic and Emergency Response).

    Traffic data for SR 1 through the project's post mile limits was provided with the Draft EIR/EIS; see Traffic Data and Designation Request Memorandum[14]. The proposed project would address the functional, safety, and structural deficiencies of the existing bridge, which would, in turn, improve traffic flow and reduce the potential for accidents and collisions on and in the vicinity of the bridge. The proposed project would also improve Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and realigning the road. These changes would improve public safety and accessibility to the Albion Campground.

30. All Build Alternatives would install permanent shoring as a necessary safety element to stabilize excavations for equipment and worker access along the steep slopes around the new bridge foundations. One of the criteria used to identify the preferred alternative was the landform change associated with bridge construction and stability of the northwest bluff. The identified preferred alternative (Design Option 2B – East Arch) has the least amount of landform change and does not propose construction on the northwest bluff.

    With respect to tribal cultural resources, there are no identified impacts to tribal cultural resources from the proposed project. For additional detail regarding tribal cultural resources, see ED Section 4.3.18, *Tribal Cultural Resources*.

31. For a discussion of the stormwater control system (culverts and drainages) and dewatering during construction, see Responses 24 and 14 above.

    With respect to water used during construction, it is anticipated that the proposed project would use up to approximately 16,000 gallons of water per day for dust control, earthwork, concrete placement and curing, and various other construction activities. Water would likely be supplied by on-site dewatering activities, local fire hydrants, and/or water use agreements with a local water

[14] Caltrans. (2023). *Traffic Data and Designation Request Memorandum.*

district, mutual water company, business(es), and/or residence(s) are anticipated. No onsite well is proposed. Water use would cease following construction, and no future development is foreseen. Therefore, the proposed project is expected to have adequate water supply that would be available during normal, dry, and multiple dry years.

32. Caltrans is coordinating with the Albion-Little River Fire Protection District (ALRFPD) regarding the proposed project to ensure use and acquisition of their property would not interfere with emergency services, or planned use of the property. In addition, access to the fire station would be maintained at all times during construction (Measure **AMM-UE-1**). Pending right of way negotiations with the ALRFPD, use of the fire station parcel for temporary construction staging would occur. Equipment or materials staging within the temporary construction easement located on the fire station parcel would not interfere with the ability of fire fighters to respond to emergency calls (see **AMM-UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles across the bridge at all times, including provisions for access during evacuations (such as for wildfires) (**AMM-TT-1**). The ED identifies that the impact to public services (including fire protection) and wildfire is a less-than-significant impact under CEQA. See Master Response 7 (Traffic and Emergency Response) for more information on emergency services during construction.

33. The ED analyzed the socioeconomic impacts of the proposed project within the Community Study Area, which encompasses the town of Albion and the census tract in which the project is located. A project-specific Community Impact Assessment, which included an environmental justice analysis, was prepared in support of the ED to provide information regarding social, economic, and land use effects of the proposed project.

    The proposed project would not cause disproportionately high and adverse effects on any minority or low-income populations. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

34. Your suggestions of possible mitigations are noted. For a summary of proposed mitigations, see Appendix D, *Avoidance, Minimization, and/or Mitigation Summary*, which includes **AMM-CR-3** to address the adverse effects to the Albion River Bridge.

35. A cumulative impacts analysis was prepared, which included a review of recently completed, current, and reasonably foreseeable projects along SR 1 and inland along SR 20 and SR 128, extending approximately 20 miles from the environmental study limits. The projects included Salmon Creek Bridge Project, Jack Peters Creek Bridge, Elk Creek Bridge Replacement, Men-1 Drainage, as well as other projects (see Table 70 in Section 3.7.3, *Cumulative Impact Analysis*). No significant cumulative impacts to local jobs and tourism were identified for the proposed project.

36. For a discussion of the 2022 public scoping process, see Response 1 above.

37. To ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period. The recordings of the public meetings are available on the project website. With respect to Alex de Grassi's concerns, Alex de Grassi submitted a comment letter. The response to Alex de Grassi's comment letter is provided above under 5.2.1.
38. Ryan Odell, the Chief of Structure Investigations – North, is a licensed Professional Engineer.
39. For details regarding the bridge's condition and bridge inspection findings from 2021 and 2022, see ED Section 1.4.2, *Need*.
40. We note your preference for rehabilitation of the bridge. Rehabilitation options that were analyzed and included in the ED involved a seismic retrofit; see ED Section 2.5.6. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.8 ANTHONY GATCHALIAN AND ALON FISH

From: Alon n Tony
To: albionbridge@DOT
Subject: Albion Bridge comment
Date: Friday, September 6, 2024 12:53:26 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Hello,

1 We prefer the original bridge to be rehabilitated with added sidewalk extensions, like the one that John Johansen drew and proposed.

2 If a new bridge is to be built we prefer the West Alignment (1b)).

Thank you.
Anthony Gatchalian
Alon Fish
33890 Albion River South Side Rd, Albion, CA 95410

Response to Anthony Gatchalian and Alon Fish

1. We note your primary preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and *Appendix I, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The addition of a walkway to the existing bridge to provide pedestrian access was not an option that was considered as there is no approved barrier that could connect to the existing bridge's timber deck to protect pedestrians from traffic; however, a Rehabilitation with Widening option that included wider shoulders was considered. Although the Rehabilitation with Widening option would facilitate somewhat safer multimodal access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for pedestrian users over the Albion River.

2. We also note your secondary preference for Design Option 1B (West Arch). The identified preferred alternative is Design Option 2B (East Arch), which was found to be the environmentally superior alternative and is similar to Design Option 1B (West Arch) in that it involves a spandrel arch that will for allow expansive views beyond the bridge.

5.9 ANTHONY WADE

From: biseball
To: albionbridge@DOT
Subject: Albion Bridge
Date: Thursday, September 12, 2024 4:30:13 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi Katie:

1

My name is Anthony 'Toby' Wade. I am an Albion resident and have been coming to the bridge meetings for, gosh, 10 years now. I am eager to see the new Albion bridge project get underway The last meeting at the Albion Grange was excellent. I realize that you get a lot of pushback from what we call the 'Bridgers'. I know they are very vocal, but there are, I believe, a majority of us who realize the bridge does not meet current standards and is subpar in its current condition and is no longer safe. I would like an update on when the project for replacement might begin. At our Rotary meeting today, we had a group from CalTrans speak to us. They were not part of the your bridge construction group, but they gave me your contact information. I would appreciate updates on the status of project.

Thank you very much,
Toby

Sent from my iBone

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) R. Anthony Wade E-mail/Phone# biseball@AOL.com

Address (home) 31401 Middle Ridge City Albion. State CA Zip Code 95410

Authorized Representative (name of organization or agency) _____

Address (business) City State Zip Code

2

COMMENTS At the meeting (8/13/24) [very well run BTW] it was mentioned that there is a Weight Limit on the Albion Riv. Bridge. But the weight was not given. On Tuesday Driving from Albion Ridge Road North on Highway One To Mendocino. I passed 3 Super Domp Trucks, 3 Log Trucks AND One Water Truck. All ~~Five~~ six were fully Loaded (Water Truck?). I do not believe There is any Weight Control on These Vehicles. The Super Trucks come from The Jack Peters Project and ~~Kim~~ Typically run in Tight formation in groups of Three or Four. I am concerned That This might seriously exceed whatever Limit exists. The Bridge is not Safe and Should be replaced.

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by ~~September~~ October 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Anthony Wade

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B has been identified as the preferred alternative.

2. The Albion River Bridge does not have a weight limit for legal trucks. However, the current vehicular live load carrying capacity of the bridge is not sufficient for routing most annual permit loads, such as oversize/overweight vehicles (e.g., mobile cranes, large tow-recovery vehicles, and many of the more “standard” permit trucks such as construction equipment haulers). The bridge is one of two locations on SR 1 that restricts permitted loads. See also the discussion on substandard live load carrying capacity in Appendix I, *Consideration of Rehabilitation Alternative*. The American Association of State Highway and Transportation Officials (AASHTO) and Caltrans’ Seismic Design Criteria require that rehabilitated and newly constructed bridges meet current load rating design standards. Eliminating the existing bridge’s structural deficiencies, including substandard live load carrying capacity, is one of the many project objectives that rehabilitation alternatives fail to satisfy.

5.10 BETH PERRILL

From: Beth Perrill
To: albionbridge@DOT
Subject: comments on the EIR
Date: Tuesday, October 8, 2024 5:57:52 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

I have lived in Albion and I use the Albion Bridge often. The local community is very attached to this iconic bridge. There is a strong desire to keep the historic bridge. If there is any way that the bridge could be kept for pedestrians that would be great. 1 When I attended the public meetings on Zoom I noted a few questions that seemed to go unanswered. Concerning the Right of Way, people wanted to know about the temporary and permanent easements. The community would benefit to know a little bit more, to be reassured, about the Right of Way process. 2 Fair market value could be explained, and adequate time to consider offers could also be explained, otherwise people just think property is "taken" without due process and protections under the constitution. It would be interesting and helpful to understand how much Right of Way the State now possesses. I see that there are tables in the EIR to show how much Right of Way will be needed and how many parcels would be affected for each alternative. The tables seem complicated and therefore a breakdown and explanation of the data would help community members understand how much land the State has and how much land the State will need to acquire in order to complete the project.

Another area of concern for the public is the current lack of public access to the beach and riverside. 3 The people know there "should be" coastal access always available within the Coastal Zone. But apparently, currently, free public access is a problem. If people could see and be reassured that the road toward the river on the northeast side of the bridge will be improved, perhaps that would be positively received. If the owners or operators of the river campground have a lease with State Lands Commission, maybe that lease could be reviewed by the project sponsor and if there are elements of the lease that could help guarantee improved free public access, or if free public access could rightfully be restored then the project would benefit by making such alterations or enforcements to the existing lease with SLC. In the after condition, under the new bridge, free public beach access should be a result of the project, perhaps the Coastal Commission will (should) mandate this.

In addition to the above concerns there are questions about pedestrians and bicycles on the new bridge. 4 We know there is an extremely active bicycle and hiking community here in Mendocino, and tourists come from all over the world to enjoy these activities. Therefore it would be important to show how the bike and ped trails will be an important link with other existing trails. If there is no logical termini for the bike and ped trails then indicate how they will link in the future. If the surface streets to and from the bridge will also be widened to accommodate bikes and pedestrians then those features must be emphasised. It appears by your maps that the approaches to the new bridge will be improved and the road to the riverside camp will be improved, I did not hear that these important design features were being highlighted at the public meetings and local folks would be happier if they knew how the network of trails would ultimately be more complete with improvements constructed with the new bridge.

Most people want a safe bridge, and most of the travelling public would like to avoid an extremely lengthy detour. 5 A safe bridge is highly desirable. Also with safety in mind the project sponsor may wish to include highlighting information to the public about necessary utilities as included across the bridge. It is likely that conduits will be needed and the utilities contained are likely conveniences and necessities that the local community would benefit from knowing about without having to dig too deep into the complicated EIR.

Thank you,

Beth Perrill

Response to Beth Perrill

1. We note your preference for converting the bridge to a pedestrian bridge. Rehabilitation and conversion of the existing bridge was considered but eliminated from further discussion as described in Section 2.5.5, *Rehabilitate and Convert Existing Bridge to Multimodal Bridge and Build a New Bridge*.

2. The proposed project would require permanent right of way (ROW) acquisition and temporary construction easements (TCEs). Permanent ROW is property outside state ROW that would be converted permanently to transportation use. TCEs are areas outside state ROW that would be temporarily needed during construction for access and staging of equipment and supplies. All permanent property acquisitions and temporary construction easements would be verified during final design and be negotiated prior to construction.

   The identified preferred alternative (Design Option 2B – East Arch) would result in approximately 2.55 acres of undeveloped land and campground property to be permanently acquired and converted to a transportation use, and 22.96 acres of land would require TCEs; Design Option 2B would not encroach onto the beach (see Figures 29 and 30 in environmental document [ED] Section 3.2.7, *Relocations and Real Property Acquisition*, and Table 4 in Chapter 2.2.6*, Unique Features of Build Alternatives*). Financial compensation would be provided for property loss and relocation expenses. Upon final project approval, Caltrans' Division of ROW, after appraising the value of required properties, would initiate good faith negotiations with affected property owners for the fair market value acquisition of property rights, including if there are any severance damages required for construction in the manner proposed by the approved and permitted alignment. Any eligible displaced occupant would be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970. For additional information, see ED Section 3.2.7*, Relocations and Real Property Acquisition*.

3. A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. The report gave consideration to additional public access at the north and south ends of the bridge within the existing and proposed state right of way and determined it was impractical due to impacts on adjacent private property, sensitive habitats, and lack of practical design options that would comply with the Americans with Disabilities Act access requirements.

   However, as noted in your comment, the proposed project would provide a structure with improved bridge approaches and a 75-year service life, which would ensure safe and reliable coastal access near the Albion River. Further, the project proposes to improve Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and realigning the road. For additional details regarding public access, see Master Response 4 (New Public Access).

4. The ED acknowledges that the proposed separated pedestrian walkway would allow for a future connection to the planned California Coastal Trail (CCT), and

that the Pacific Coast Bike Route (PCBR) currently crosses the existing bridge and will continue to cross the replacement bridge. Future links to the CCT and PCBR are outside the scope of the project and were not analyzed in the ED.

5. Poles for existing overhead telecom lines are located on the hillsides near each of the existing bridge's abutments. These utility lines would be relocated temporarily during construction, as needed, and would be relocated permanently to conduits on the new bridge superstructure (see Section 2.2.5, Common Design Features of the Build Alternatives).

5.11 BILL SCHIEVE

From: Bill Schieve
To: albionbridge@DOT
Subject: Public Comment on Environmental Disruption and Preservation of the Historic Albion River Bridge
Date: Sunday, September 8, 2024 3:24:30 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1

I am writing to express my strong concerns about the broader environmental disruptions that the Albion River Bridge Replacement Project in its several "build alternatives" may likely cause. Constructing a new bridge could lead to significant habitat loss (including through shading by the substantially wider new bridge design), soil erosion, and water pollution, all of which would have lasting impacts on the local environment and wildlife (Draft Final Hydraulic Report, p. 9-10).

2

In contrast, rehabilitating and preserving the existing historic Albion River Bridge would greatly reduce the environmental footprint of the project. Rehabilitation requires fewer resources and less invasive construction methods, which would help protect the natural landscape and the species that depend on it. Moreover, preserving the existing bridge would honor its historical and cultural significance with less ecological impact.

I urge the project team to prioritize the rehabilitation of the existing bridge as a sustainable and environmentally responsible alternative.

3

I WOULD ALSO LIKE TO STATE, What I think to be the OBVIOUS:
I understand that an independent team of engineers and investigators did their research and found the existing bridge TO BE SOUND and SAFE!, I would imagine due to the earthquake "retro-fitting" which was accomplished just a few years ago.

So….HOW is it that now, suddenly, Cal-Trans comes along and declares the bridge is unsafe and not sound and dangerous and needs this huge project?!? Sounds to me that, once again, a small group of money people have made a decision for money profiting to a small group of someone, raiding our California tax payers coffers to pay for an UNNECESSARY huge project that will profit benefit a small group of people, when that tax payer money could be spent on some project(s) which is/are actually more immediately needed and necessary for the public at large.

Do not allow this boondoggle!!

Thank you for your attention to this important issue.

Sincerely,

Dr. Bill Schieve

Sent from my iPad

Response to Bill Schieve

1. A comprehensive environmental analysis was completed for the proposed project. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including for impacts to biological resources. Under CEQA, mitigation measures were identified for potentially significant impacts, with their implementation, less than significant level. See Appendix D*, Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. See Master Response 13 (Environment) for more information on effects to environmental resources.

   Additionally, during construction, the proposed project would implement a site-specific Stormwater Pollution Prevention Plan, which would include construction site BMPs to control sedimentation, erosion, and potential chemical pollutants.

2. Rehabilitation was considered but eliminated from further discussion as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, including impacts associated with rehabilitation activities, see Master Response 1 (Rehabilitation).

3. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

5.12 BRAD HARRIS

From: Walker, Liza M@DOT
To: albionbridge@DOT
Subject: Fw: Albion River Bridge
Date: Tuesday, October 8, 2024 10:02:15 PM

From: bdhcc@mcn.org <bdhcc@mcn.org>
Sent: Tuesday, October 8, 2024 9:54:08 PM
To: Walker, Liza M@DOT <liza.walker@dot.ca.gov>
Cc: Polanco, Julianne@Parks <Julianne.Polanco@parks.ca.gov>; Everett, Katie@DOT <Katie.Everett@dot.ca.gov>
Subject: Albion River Bridge

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Dear Ms Walker,
I support preserving the Albion River Bridge.

The Albion River Bridge is unique in all these United States.
It's existence was only possible because of World War 2 austerity measures.
A very special circumstance.
Because of it's relatively recent construction it's engineering is unparalleled.

My personal research points to The Albion River Bridge as the 3rd longest and by far the

TALLEST TIMBER TRESTLE HIGHWAY BRIDGE IN THE US.

The Historic Albion River Bridge is in perfect harmony with it's environment and
deserves consideration and preservation as a rare and singular example in the history of bridge building in our country.

Brad Harris
PO box 11
Albion, Ca 95410

Response to Brad Harris

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.13 BRUCE LAKS

From: Bruce Laks
To: albionbridge@DOT
Subject: Cease and Desist on Plans to Replace
Date: Monday, September 9, 2024 3:26:42 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

PLEASE reconsider the planned replacement of the Albion Bridge - The many ways in which the community and the entire Coast will suffer during the long phases of this project must be avoided.

Safety and well-being will be sacrificed by all in a myriad of ways. Emergency response will be challenged. Air quality, every aspect of the environment. The peace and well-being of residents near and far.

Add a pedestrian & bicycle span if necessary.

Do not replace this bridge at this time. Too many will suffer in too many ways.

Respectfully,
Bruce Laks
Little River CA

Response to Bruce Laks

1. Alternatives to replacement of the bridge, including rehabilitation options and a No-Build Alternative, were considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document in Section 2.5, *Alternatives Considered but Eliminated from Further Discussion Prior to Draft EIR/EIS*.

   Emergency response agencies would be notified of the proposed project construction period and would have access to SR 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles across the bridge at all times, including provisions for access during evacuations (such as for wildfires) (**AMM-TT-1**). See Master Response 7 (Traffic and Emergency Response) for more information on emergency services and traffic control during construction.

   A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including controls to protect air quality. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments, and Master Response 9 (Air Quality).

   The addition of a walkway to the existing bridge to provide pedestrian access is not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. However, a Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

5.14 CARMEN GOODYEAR

From: Carmen Goodyear <ttfarm@mcn.org>
Sent: Sunday, September 29, 2024 11:53 AM
To: Walker, Liza M@DOT <liza.walker@dot.ca.gov>
Subject: Re: Notice of Availability of the Draft EIR/EIS and Draft Section 4(f) Evaluation for the Albion River Bridge

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms.Walker,

Here are my thoughts after the meeting on Sept. 26th. Please let me know where is the best place to send them so that more people than just you actually read them and take them into consideration before the next public meeting.

_____

1

I listened in to the first part of the public meeting on Sept. 26 and have these comments to make.

I thought the first two presentations were clear and concise and were addressing the main issue I am concerned about- the safety of the current bridge.

2

After presenting some scary photos of rotted deck planks, checked posts and rusty connectors and bolts the presenter said loudly and clearly that the present bridge is safe right now. I suppose he didn't want to scare people who drive across it every day. He said that the checks in the fir posts do not weaken the bridge. And that the rotting deck boards do not effect safety.

My question is- is the bridge safe or not??? If it is safe at the moment then why is rehabilitation not being pushed as hard as rebuilding. Could it be the huge budget that would come to Caltrans?

It seems that simple calculations could be done on what is needed to rehabilitate. What percentage of the deck planks are actually rotting? Same with the bolts and connectors? What would be the cost and impact on use while these are being replaced? Replacing the steel understructure and cement posts would obviously have bigger impacts but could be done and would certainly be less of a disruption than tearing down the present bridge and building a whole new one.

My last question is- has the bridge deteriorated in the years since Caltrans stopped doing maintenance on it? The presenter said that inspections are every year and I was happy to hear that. But have the inspectors noticed significant deterioration since Caltrans abandoned it.

I hope these questions get answered in the next public meeting. Essentially we need to know if the bridge is safe right now and if so, why it can't be kept in this safe condition going forward.

Sincerely, Carmen Goodyear
Albion resident since 1969

Response to Carmen Goodyear

1. Comment noted.
2. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   As FHWA succinctly stated in its 2021 Bridge Inspection Program Annual Review as it "is evident that Caltrans has been prudent at keeping this bridge in service beyond its expected years. It will require more resources to inspect, repair, and eventually reduce the level of serving the transportation needs of SR 1. All the reasons for the replacement of this bridge is at hand and the need to quickly replace this high-risk structure on this important coastal route is prudent".

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and *Appendix I, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.15 CAROL CLARY

From: Carol Clary
To: albionbridge@DOT
Subject: Bridge Replacement
Date: Thursday, August 15, 2024 7:21:03 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Having lived on the north side of Albion Bridge for over 30 years and now having moved away because of fear for what you are doing to the community. Not wanting to spend my golden years in the middle of a construction war zone, I ask you to do all you can to preserve the integrity of the community. People have lived here and cared for the land and want to preserve the uniqueness of the. community. They do not want to live on a major freeway. I totally understand the need for a new bridge and its safety. But please do it with integrity. You will destroy the northside community and people have poured their heart and souls into it.
Thank you,
Carol Clary
Formerly 3751 Albion Little River Rd

Response to Carol Clary

1. A comprehensive environmental analysis for the proposed project was completed. The environmental document identifies measures to avoid, minimize, and/or mitigate environmental impacts, including measures to address noise, air quality, traffic, and other community-related impacts. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. Additionally, the proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

5.16 CHARLES ARTIGUES

From: Charles Artigues
To: albionbridge@DOT
Subject: Albion River Bridge project
Date: Sunday, September 1, 2024 7:40:23 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I understand many of the controversies, but as a coastal resident of over 30 years I believe it is time for a new bride here, and I may get a lot of flack from some of my friends and neighbors, I kind of like the arch design you came up with.

Response to Charles Artiques

1. We note your support for bridge replacement with an arch design. The identified preferred alternative is Design Option 2B (East Arch), which was found to be the environmentally superior alternative and involves a spandrel arch that will for allow expansive views beyond the bridge.

5.17 CHARLES LANG

From: Charles Lang
To: albionbridge@DOT
Subject: HISTORIC bridge !!
Date: Saturday, September 7, 2024 6:48:42 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Bridge should NOT be demolished !!
— It is a DESTINATION that is HISTORIC and EDUCATIONAL and UNIQUE
— Should be SAVED as pedestrian and bike and VIEWING PLATFORM and VISTA POINT crossing for FAMILIES
— People who want to replace it should see THERAPISTS because they are doing it to give their friends MONEY $$$$$, because they all get MONEY $$$$$ if it is replaced.
— life needs to SLOW DOWN and become less MEAN to each other.

- Charles Lang, alcohol-free CALIFORNIA

Sent from my iPhone

Response to Charles Lang

1. We note your preference for converting the bridge to a pedestrian bridge. Rehabilitation and conversion of the existing bridge was considered but eliminated from further discussion as described in the environmental document in Section 2.5.5, *Rehabilitate and Convert Existing Bridge to Multimodal Bridge and Build a New Bridge*.

5.18 DAN GATES

From: Daniel C Gates
To: albionbridge@DOT
Subject: Albion River Bridge
Date: Wednesday, September 25, 2024 10:00:27 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

I am a long-term Albion resident, Here are the concerns that I share with our community.

1

We choose to live here because of the remote wild character of Albion. We like the fact that currently traffic slows down for the sharp turns at the bridge, and we do not relish anticipated higher highway speeds. The Mendocino Coast is highly scenic, not to be hurried through! Yes, the old bridge is glorious and iconic, but improving safety and removing Hazardous Waste timbers is also a good thing.

2

Removing the bridge footprint from the beach is a big plus to having a new single arch bridge. We would like to see the area under the bridge be restored to its original grade with local native plants and an ecologically functional estuary. There should be free public access to walk to the beach and to launch kayaks into the river. We need the view of the ocean from the bridge to be unencumbered. There should be safe pedestrian and wildlife crossing to get to the west side of the bridge. I would look forward to enjoying the view of the Albion Cove, without risking my life to walk the existing bridge. Please consider the nesting capacity of the new bridge for bird species such as purple martins, cliff swallows and peregrine falcons.

3

There is a remarkable mitigation opportunity for eelgrass and coho habitat restoration in the river by removing existing hardscape. There is half a mile of plastic seawall in the estuary, where instead there should be salt marsh, pickle weed and glorious estuary habitat. This will benefit multiple endangered species plus increase coastal resiliency to sea level rise for all of us. This is a remarkable opportunity for Caltrans to take credit for some very good restoration work

Thank you Dan Gates

Response to Dan Gates

1. The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

2. Areas of temporary disturbance under the bridge would be restored. A project-specific Revegetation Plan would be implemented that utilizes regionally appropriate native plants (see **AMM-AR-4**).

   For details regarding public access, see Master Response 4 (New Public Access).

   The ED reveals that the arch design options (including the identified preferred alternative, Design Option 2B – East Arch) allow expansive views beyond the bridge, with the arches framing the view of the river cove beneath them. The separated pedestrian walkway on the west side of the bridge would allow a safe, dedicated area to enjoy enhanced views of the ocean.

   Appropriate safety features and design refinements to access the separated pedestrian walkway on the west side of the bridge would be assessed and incorporated into the final design prior to construction.

   Your request to consider nesting capacity of the new bridge for purple martins, cliff swallows, and peregrine falcons is noted; potential improvements would be evaluated as the project design is refined.

3. Removing the existing plastic seawall in the estuary is not a component of the proposed project.

   Mitigation for eelgrass is described under **AMM-BR-8**; additional detail is provided in Appendix D, Section D.3.3, *Compensatory Mitigation for Seagrass*. All necessary standards outlined in the California Eelgrass Mitigation Policy would be followed, including the development of a comprehensive mitigation and monitoring plan to ensure no net loss of eelgrass. Adaptive management may be needed for restoration efforts. Restoration to offset impacts to eelgrass would be developed in coordination with regulatory agencies.

   To mitigate for impacts to federally and state listed fish species, including coho salmon, Caltrans would pursue feasible mitigation opportunities to offset impacts. Potential options include improving habitat complexity or partially funding an important salmonid recovery project within the area (see **AMM-BR-10**).

5.19 DAVID STEINRUECK

From: David Steinrueck
To: albionbridge@DOT
Subject: Public Comment - Safety & Negative Impact on Our Community
Date: Monday, September 9, 2024 11:09:30 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Liza Walker,

I'm a local resident living in Albion village along with my wife and young daughter. Having read through the DEIR/DEIS, I'm shocked by the lack of a detailed assessment of the impact your proposed options will have on the local community. Here are some of my main concerns:

1

1) Liveability:
The report does not adequately assess the impact that 3-5 years of construction and the complete transformation of our landscape will have on residents of the village. The proposed plans would make our home completely unlivable for us and our daughter and we would be forced to move. Your proposal details plans for staging, but does not address the severe impact that hundreds of workers, new roads, and massive machinery will have on residents: it will completely destroy the ability to conduct normal life for locals residents.

2

2) Safety concerns
The plans propose adding a sidewalk to the bridge with no safe way to access this sidewalk, and no connections to the Albion village or the public beach. At the community meeting at Whitesboro Grange, the Caltrans team (I believe you overheard this) claimed that the proposed plan is to ask people to cross over the highway to get to the walkway. Suggesting that someone should run across a highway with 3k cars speeding past every day is incredibly dangerous, especially for kids and elderly. Any plans need to address how to safely access the walkway, and how this walkway safely connects to the public beach.

3

3) Cultural impact:
The report fails to address in any depth the impact that this project will have on the community. It states that there will be severe, unmitigated impacts on the community, but does not account for any real financial or cultural consequences. What would San Francisco be if we tore down the Golden Gate and replaced it with an ugly, environmentally destructive bridge? The bridge is significant for the coast, the state, and the country, and will destroy the financial and cultural value of the village if replaced with any of the proposed options.

4

I urge you to consider adding a rehabilitation option back into the proposed plans, and to implement this option. The $100+ million budget would be far better invested in maintaining and updating the existing bridge with seismic retrofitting and would not decimate our local community.

Sincerely,

David Steinrueck

From: David Steinrueck
To: albionbridge@DOT
Subject: Comment on Albion River Bridge Project
Date: Wednesday, October 9, 2024 9:18:12 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi Liza,

5

I am writing to reinforce the need for a detailed public access plan for any proposal you put forward. We live in the Albion village and will have, according to your report, irreparable damage to the historic character and feel of the village.

If such an important resource is swept off the coast and will alter our town forever, we feel that it is critical to at the very minimum provide the village with a secure way to reach the beach with public access.

6

Secondly, the proposals all include a walkway across the bridge. If there is going to be a walkway, we need a safe way to reach it so we are not required to walk along or cross over a dangerous highway with 3,000 cars crossing daily to reach the walkway. This could include a path from the village to the walkway if it is on the east side, or crossing lights that can be activated for pedestrians on both sides.

Thanks,

David Steinrueck

Response to David Steinrueck

1. A comprehensive environmental analysis for the proposed project was completed. Standard measures and avoidance and minimization measures were identified to reduce impacts. Further, mitigation measures were identified for potentially significant impacts, including to aesthetics, biological resources, and cultural resources. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level, while impacts to aesthetics and cultural resources would remain significant and unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls.

   For additional detail regarding community-related impacts, see Master Responses 9 (Air Quality), 10 (Noise), 7 (Traffic and Emergency Response), and 6 (Local Economy).

2. Appropriate safety features and design refinements to access the separated pedestrian walkway on the west side of the bridge would be assessed and incorporated into the final design prior to construction.

3. Under all Build Alternatives, the Albion River Bridge would be completely removed, and the proposed project would result in a significant and unavoidable impact to cultural resources under CEQA. Implementation of Mitigation Measure **AMM-CR-3**, which includes treatment measures such as an interpretive exhibit, would lessen the impact but would not reduce the impact to a less-than-significant level under CEQA.

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, the proposed project is not anticipated to cause permanent changes that would alter regional economic conditions. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

4. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5. For details regarding public access, see Master Response 4 (New Public Access).

6. Appropriate safety features and design refinements to access the separated pedestrian walkway on the west side of the bridge would be assessed and incorporated into the final design prior to construction.

5.20 DAVID WYLIE

From: David Wylie
To: albionbridge@DOT
Subject: Albion River Bridge Project; DEIR Comment
Date: Wednesday, September 4, 2024 4:20:10 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Eureka Office Chief Walker,

1

I fully support replacing the Albion River Bridge with a modern design for public improved safety! Please don't delay. The existing bridge has out lived it's usefulness and poses a real public safety risk!

Sincerely,

David Wylie
32100 Albion Ridge Rd
Albion, CA 95410
Kilarc6@gmail.com

From: David Wylie
To: albionbridge@DOT
Subject: Don't wait!
Date: Monday, September 9, 2024 7:41:13 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

We need a safe bridge now please don't wait! Everyday I drive over that bridge I am concerned for my safety and the safety of others! Please don't let a minority pressure the state and delay this project any longer! Lives could be at risk! Rebuild the bridge Now before it's too late!

David Wylie

Response to David Wylie

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.21 DEBRA DOERINGT

From: Lieshi Galandil
To: albionbridge@DOT
Subject: Public Comment on Biological Resource Disruption and Preservation of the Historic Albion River Bridge
Date: Tuesday, October 8, 2024 8:59:19 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

I am writing to voice my concern regarding CalTran's recently proposed Albion River Bridge Replacement Project. There are many crucial reasons why this proposed project is unnecessary and disastrous, both to the local community, Mendocino County as a whole, and to the surrounding environment.

1

First, The Noise Study Report indicates that construction activities will produce significant noise levels, which will create an egregious and constant disturbance to residents and paying visitors in the nearby area, as well as to avian, terrestrial, and aquatic wildlife (Noise Study Report, p. 20-24). At every biological level, they depend on the natural sounds of the ocean's wave action, changing winds patterns, and interludes of total quiet to distinguish important sounds for their own survival, such as the calls of their flock, the sounds of potential predators, and the very specific calls of their individual mates and young.

2

Secondly, the Draft Final Hydraulic Report proposes major changes to floodplain dynamics due to the construction of alternative new bridge alignments (Draft Final Hydraulic Report, p. 4-10), which would have a huge negative impact on the natural flow of the Albion River, as well as many of the same types of wildlife species listed above which depend on it, including juvenile salmon, which feed there before continuing their migration on to the Pacific Ocean.

3

Thirdly, there will be an irrevocably significant, unmitigated impact of the Albion River Bridge Replacement Project on the local economy and rural, small-town nature, which has been cultivated and protected assiduously for many decades. For example, the Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17), not to mention the commute of workers who need to travel along the bridge for their commute to work.

4

Furthermore, and even more alarming, according to the independent report submitted to you by Dr. Abolhassan Astaneh-Asl, Ph.D., P.E. on September 9 of this year, "*The Caltrans engineer who has signed and stamped the 2023 Inspection Report of Albion River Bridge has almost completely ignored the actual inspection data in the inspection report and* ***subjectively and arbitrarily has assigned the condition rating of Poor to the Superstructure and Substructure of the Albion River Bridge.*** *The assignment of an unjustified poor condition rating to the Superstructure and Substructure automatically has made the Albion River Bridge rated as a bridge in poor condition. As I explained earlier in this letter,* ***the ratings of Poor assigned to***

the Superstructure and Substructure are arbitrary and not based on actual inspection data."

Building a new bridge structure is apparently totally unnecessary and destructive, and during construction will then likely alter the natural flow of the wild and scenic Albion River, causing serious damage to the surrounding ecology and wildlife species, the nearby community, and the fragile economy local residents and businesses, as well as the entire county of Mendocino. Therefore, I urge you to reject this irresponsible proposal and work instead to rehabilitate the existing historic Albion River Bridge. Preservation would maintain the current hydraulic balance and limit the serious negative impacts mentioned above, while also honoring the bridge's historical and aesthetic significance.

Please honor the values and hard work of this local community and its predecessors to respect and preserve the unique beauty, natural ecology, history and integrity of this remarkable bridge and its surroundings

Thank you,

Debra Doeringt
Local resident for 43 years

Response to Debra Doeringt

1. Both airborne and underwater noise were analyzed in the environmental document (ED). The proposed project would not have significant noise impacts. Construction and associated noise would be temporary, and the project would implement minimization measures to reduce noise impacts (see **AMM-NOI-1).** For additional detail regarding temporary noise impacts during construction, see Master Response 10 (Noise).

   For acoustic impacts to wildlife, see ED Sections 3.4.4 and 3.4.5, *Animal Species* and *Threatened and Endangered Species.*

2. The draft Final Hydraulic Report prepared for the proposed project concludes that there would be no anticipated change in the lateral extents of the floodplain from existing to proposed conditions. The proposed project was determined not to cause any significant hydraulic or scour-related issues and would not change the water surface elevation for the 100-year floodplain. For additional details, see ED Section 3.3.1, *Hydrology and Floodplain*.

   Potential impacts to salmon are discussed in Section 3.4.5, *Threatened and Endangered Species*, of the ED.

3. The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

   The proposed project would not permanently block public access to the Albion Campground and, pending right of way negotiations, certain Albion Campground facilities may remain open to visitors using the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives,* or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction).

   Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Responses 7 (Traffic and Emergency Response).

4. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections

and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in ED Section 1.4, *Purpose and Need*.

We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.22 DENNIS LANDER

From: Dennis Lander
To: albionbridge@DOT
Subject: Comments on new Albion River Bridge on Hwy 1
Date: Sunday, September 29, 2024 9:04:57 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I totally support the replacement of the Albion River Bridge.
Yes the old bridge is special and its made out of redwood but it function is to make it safe and long term transportation from the north coast back to the bay area.
I have been traveling over the current bridge for 73 of my 75 years. For the last 5 years I have lived in Little River and that bridge is our connection to business and medical services.
It is very important to our Community to have a structurally safe bridge in this day of potential earthquakes.
I will take my pictures of the old bridge to show my grandkids just like the Casper bridge and the Noyo bridge.
The pictures of the proposed bridge look really nice. Cant wait to drive across it.

Dennis Lander
33401 Frog Pond Road
Little River, CA 95456

Response to Dennis Lander

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.23 DOBBY SOMMER

From: dobby sommer
To: albionbridge@DOT
Subject: Do not take down the Albion Bridge
Date: Sunday, October 6, 2024 6:06:44 PM

1

EXTERNAL EMAIL. Links/attachments may not be safe.

I am asking Caltrans to go back to the drawing board.
Discuss the alternatives to taking down our bridge. Please address the restoration and seismic upgrade and addition of a cantilever pedestrian and bike path for our Albion bridge which is a lower cost solution.

2

And you are required by law to maintain the bridge so it can continue being safe for years to come.
I am totally in opposition to Caltrans plans which will negatively impact all the businesses in the area as well as negatively impact the fauna and flora of our area as well as negatively impact the mental health of the Albion people.

dobby sommer
pob 568
Albion Ca
95410

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

Response to Dobby Sommer

1. We note your opposition to the proposed project.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The addition of a cantilevered walkway to the existing bridge to provide pedestrian access is not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. However, a Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

2. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct. The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

   A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including measures for impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments.

5.24 DOBIE DOLPHIN

From: Dobie Dolphin
To: albionbridge@DOT
Subject: Albion Bridge Draft Environmental Impact Rerpot
Date: Friday, September 6, 2024 8:04:06 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Re: Comments on the DEIR

1 My name is Dobie Dolphin. I moved to Albion in 1971. I'm writing to comment on the Albion Bridge DEIR. I found the document confusing and difficult to read. First of all, I had to get to page 37 before I found the Table of Contents. There was no search box, so it was impossible to search for a specific issue without going through the entire document. There was a huge amount of repetition and some serious omissions.

2 In past meetings and documents, there was the option of preserving the original bridge with seismic upgrades, rehabilitation and maintenance. The DEIR no longer includes this option but offers the option of "Do Nothing" which is not the same. There are no estimates on what it would cost to maintain the bridge whereas the cost of a new bridge is estimated at $150 million. We know there are always cost overruns.

3 In terms of the environment, there are many reasons for maintaining the existing bridge instead of building a new one. Let's look at the use of materials. Concrete accounts of 8% of CO 2 emissions on a global level. The production of concrete is more carbon intensive than the aviation industry, with air travel only accounting for 2% of global emissions. Concrete is using almost a tenth of the world's industrial water. Sand is one of the main ingredients in making concrete and current demand is so high that it's being used faster than it can be replenished. To reduce greenhouse gases, there is a movement to use wood, a renewable resource for construction. See https://www.dezeen.com/2022/08/03/ascent-tower-milwaukee-worlds-tallest-timber-building/

https://www.architecturaldigest.com/story/worlds-tallest-wooden-skyscraper-greenlit

The DEIR says 1,984 metric tons of greenhouse gases will be produced. I don't know what that means in layperson's terms. It sounds like a lot.

4 The DEIR doesn't say how many truckloads of concrete and steel would be needed and where these trucks would come from. It doesn't say how many workers would be needed and Caltrans says they would not be locals, who may have their livelihoods affected by the 3-5 years it would take to build a new bridge and remove the old one. Where will the workers live? Caltrans says in motels and hotels in Fort Bragg. These are often filled by tourists and they need to be available for tourists since tourism is the main source of income for the Mendocino coast.

5 We've been watching what Caltrans is doing on the Jack Peters Creek bridge and the work has not inspired confidence. So many big, beautiful trees have been removed and now there's a steep dirt hill which looks horrible and may cause damage when the rains start. Was that really necessary? To do the work the DEIR suggests, many, many, more trees would have to be removed, ron steep hillsides, roads widened and the environment adversely affected.

6 The DEIR talks about a trestle going across the river. How tall would it be? How many trucks

would be using it? What would be the effect on eelgrass beds and fish?

7 Large trucks would be going through the town of Albion, passing by the Post Office, the Hardware store, Grocery store and Fire Department creating traffic hazards, noise and pollution. It's a very busy area with people going to get their mail, buy groceries, gas and items from the hardware store, tourists stopping for supplies since it's the first store since the town of Navarro, delivery trucks, the Food Bank truck, the MTA, as well as Fire Department vehicles during an emergency. It's already a congested area at certain times during the day.

8 Some of the staging areas for materials are near residential homes. How will the materials be protected? What's to keep dirt from blowing around during normal coastal winds?

9 The economy is going to be affected. Albion has always been a popular spot for fishing, diving and kayaking. The Albion Flats will be closed to camping, so people will go elsewhere. Who will want to stay at the Mendocino Coast Lodge (formerly Albion River Inn) with all the noise and traffic?

As for the bridge being usafe, it wouldn't be open if it were unsafe and there is currently no weight limit posted.

10 There are so many things wrong with this plan it's impossible to address them all.Caltrans is planning to use Granite Construction as the Construction Manager, a company that has received over $22 million in penalties since 2000, including fraud, environmental violations (water pollution and air pollution) and workplace safety.

11 After the work is done on the Albion bridge, then comes the Salmon Creek bridge replacement. More traffic tie ups, more trucks and noise and pollution. Our quiet, scenic, rural area will be transformed.

12 Caltrans has not respected the interests of the community and the environment in the past and that's unfortunate. The local hearings were a joke. The last one was an hour and a half long and Caltrans spoke for half the time. Lots of people had questions but only a few were called on and didn't really get any answers. "We'll look into it" or "we'll get back to you" were common replies. Here's an opportunity for Caltrans to do the right thing, to withdraw the current DEIR and include the option of restoring, upgrading and maintaining the iconic, historic Albion Bridge.

Sincerely,
Dobie Dolphin
Albion, CA.

Response to Dobie Dolphin

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/ Quality Control (QA/QC) to ensure the document satisfied all legal requirements.
2. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   Both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) require consideration of a No-Build (No Action) Alternative. As identified in the ED, under the No-Build Alternative, the proposed project would not occur, and the existing bridge would remain in its current condition. See Section 2.2.1, *No-Build (No Action) Alternative*.
3. The carbon dioxide equivalent (CO_2e) produced during construction for the proposed project is estimated to range between approximately 1,839 and 3,173 metric tons depending on the Build Alternative. Under the identified preferred alternative (Design Option 2B – East Arch), an estimated 2,091 metric tons is anticipated to be generated during construction. Following construction, the proposed project would not increase capacity of the roadway or change travel demands, and the fleet mix would remain the same relative to the No-Build Alternative. GHG emissions would not increase operationally due to the proposed project.

   For a detailed discussion of greenhouse gas emissions, including federal and state inventories of total greenhouse gas emissions that can be referenced for contextual purposes, see ED Section 4.5, *Climate Change*.
4. The construction emission model used for the project-specific Air Quality Analysis includes emission estimates from on-road and off-road sources during construction. The on-road source category includes emissions from trucks used to transport materials to the construction site.

   FHWA regulations prohibit local hiring practices or preferences. However, it is anticipated that the workforce could include local Mendocino County residents. Additionally, the proposed project is not anticipated to result in the need to construct new housing for construction workers. Construction workers may elect to stay in Albion, Fort Bragg, or other nearby areas, where they would commute to and from the construction site. Proposed construction activities would not contribute to changes in housing characteristics in the community of Albion or the rest of the Community Study Area.
5. Vegetation removal associated with the proposed project would be limited to only the amount necessary to facilitate the construction work. Vegetation that is removed or disturbed due to construction would be replaced in accordance with a

project-specific Revegetation Plan that utilizes regionally appropriate native plants (see **AMM-AR-4**).

6. The ED describes the proposed temporary trestles in Section 2.2.5, *Common Design Features of the Build Alternatives*. The temporary trestles would sit parallel to the existing bridge, would span the deepest portion of the Albion River outlet to the Pacific Ocean, and would meet minimum clearance requirements set by the U.S. Coast Guard. The temporary trestles would be used for equipment, materials and construction worker access to the existing bridge and replacement bridge.

   Impacts to eelgrass were assessed for the Build Alternatives. Under the identified preferred alternative (Design Option 2B – East Arch), temporary impacts to eelgrass are estimated to be less than 0.01 acre, and no permanent impacts to eelgrass are anticipated.

   Mitigation for eelgrass is described under **AMM-BR-8**; additional detail is provided in Appendix D, Section D.3.3, *Compensatory Mitigation for Seagrass*. All necessary standards outlined in the California Eelgrass Mitigation Policy would be followed, including the development of a comprehensive mitigation and monitoring plan to ensure no net loss of eelgrass. Adaptive management may be needed for restoration efforts. Restoration to offset impacts to eelgrass would be developed in coordination with regulatory agencies.

   For a detailed discussion on impacts to listed fish during construction, see ED Section 3.4.5, *Threatened and Endangered Species.*

7. Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**).

   For additional detail regarding traffic impacts and temporary noise impacts during construction, see Master Responses 7 (Traffic and Emergency Response) and 10 (Noise).

8. Materials temporarily stored at staging areas would be managed consistent with a site-specific Stormwater Pollution Prevention Plan, which would include construction site BMPs to control sedimentation, erosion, and potential chemical pollutants. See Table 30 in ED Section 3.3.2, *Water Quality and Stormwater Runoff*.

   With respect to fugitive dust, Caltrans Standard Specification Section 14-9.02 requires that the project comply with all rules, regulations, ordinances, and statutes that apply to work performed under the contract, including air pollution control rules, regulations, ordinances, and statutes provided in Government Code Section 11017 (Public Contract Code Section 10231) (see also Standard

Measure **GHG-1**). Additional control measures are specified in Caltrans Standard Specifications Section 10-5, Dust Control, and Section 18, Dust Palliatives and Measure **AMM-AQ-1**. Where Caltrans Standard Specifications conflict with applicable Mendocino County Air Quality Management District rules, the project would be required to comply with the more stringent control or standard.

9. The proposed project would not permanently block public access to the referenced amenities and, pending right of way negotiations with the Albion Campground, certain Albion Campground facilities may remain open to visitors using the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives*, or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction).

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, the proposed project is not anticipated to cause permanent changes that would alter regional economic conditions. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

   For details regarding the bridge's condition and the proposed project's purpose and need, see Section 1.4, *Purpose and Need*.

10. Comment noted.

11. A cumulative impacts analysis was prepared, and no significant cumulative impacts were identified for the proposed project (see ED Section 3.7.3, *Cumulative Impact Analysis*).

12. To ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period.

    We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.25 DOT BROVARNEY

From: Dot Brovarney
To: albionbridge@DOT
Subject: Public Comment on Community Impact and Preservation of the Historic Albion River Bridge
Date: Saturday, October 5, 2024 12:22:40 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1

I am writing to address the significant community impact of the Albion River Bridge Replacement Project, which, if implemented, will cause loss of natural habitat and part of the historical fabric of our Mendocino Coast..

2

As a longtime public historian working in Mendocino County, I've watched as a number of historic bridges and other structures of traditional significance to our communities have been allowed to deteriorate and then undergo demolition. In this case, the structural review by professional engineers Drs. Brungraber and Schmidt has determined that this bridge is not even close to the condition that requires such an extreme and costly project as total replacement. Caltrans' replacement effort is a waste of taxpayer money, and appears to be a willful disregard for the engineers' expertise and the views of the surrounding community.

I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigated impacts on the natural and human environment. Rehabilitation of this significant historical structure is the wise choice in this case — practically, economically, and biologically. The existing bridge holds significant historical value — it beautifully reflects Mendocino's coastal heritage and its preservation is important to Mendocino County's history.

Please prioritize the rehabilitation of the existing Albion River Bridge. Thank you.

Sincerely,

Dot Brovarney
Historian/Author/Publisher
www.mendocinorefuge.com

Response to Dot Brovarney

1. A comprehensive environmental analysis for the proposed project was completed. The environmental document (ED) identifies potentially significant impacts to aesthetics, biological resources, and cultural resources. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level, while impacts to aesthetics and cultural resources would remain significant-and-unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls.
2. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.26 DOUG WILSON

From: Wilson, Douglas R
To: albionbridge@DOT
Subject: Wood is good
Date: Tuesday, August 13, 2024 10:29:17 PM

1

EXTERNAL EMAIL. Links/attachments may not be safe.

Love the old Albion bridge. Let's preserve and maintain it.
Thank you

Doug Wilson, MD FAAFP
Medical Director
SUPPORTIVE/PALLIATIVE CARE
1000 Trancas St Napa CA 94558
C: (707)227-2882 T: (707) 257-4042 F: (707)251-3633

This message is intended for the sole use of the addressee, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the addressee you are hereby notified that you may not use, copy, disclose, or distribute to anyone the message or any information contained in the message. If you have received this message in error, please immediately advise the sender by reply email and delete this message.

Response to Doug Wilson

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.27 ELIZABETH CANADY

From: Elizabeth Canady
To: albionbridge@DOT
Subject: Question about start date
Date: Thursday, July 11, 2024 9:44:48 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi!

1

I work and live at Albion River Campground. During the day, I get various guests that tell us we're "shutting down" next year (2025) for the bridge and they aren't planning on coming back bc of it. I always say "I don't know anything about that because I don't know a proposed start date."
Can you help me clarify that now or would it be best for me to wait for the Q&A on 8/13.

Thanks!

Elizabeth Canady
Sent from my iPhone

Response to Elizabeth Canady

1. The project is programmed to start construction in 2027. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct. Pending future right of way negotiations with the Albion Campground owners, use of certain vehicle and pedestrian paths within the Albion Campground, including access to Albion Flat Beach, would likely be limited during construction for the safety of construction workers and the public. It is anticipated that the campsites would be used for construction equipment and materials staging (see Figure 16 in the environmental document). However, it is expected that access to other Albion Campground facilities (e.g., convenience store, restrooms, showers, dock and marina, boat launch) would not be affected and could remain open to visitors.

5.28 ESTHER FABER

From: Esther Faber
To: albionbridge@DOT
Subject: comment
Date: Sunday, August 4, 2024 12:08:44 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Hello,
I live in Little River, CA.
I cross this bridge once every week or two.
I am in favor of replacing it with a safer bridge. One that is sturdy, long lasting and can withstand a moderately high level earthquake and has lanes for walkers and bicycle riders.
Esther Faber
43300 Little River Airport Rd #78
Little River, CA 95456
Sent from my iPhone

From: Esther Faber
To: albionbridge@DOT
Subject: My opinion
Date: Tuesday, September 10, 2024 9:04:25 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

My understanding is that CalTrans has extensively researched the current Albion River Bridge and has decidedly concluded that it is unsafe and that it is not feasible to upgrade it to make it safe.
Therefore I am strongly in favor of building a new safe bridge that will safely accommodate walkers and bicyclists on both sides of the bridge.
Esther Faber
43300 Little River Airport Road #78
Little Tiver, CA 95456-9612

Sent from Yahoo Mail for iPhone

Response to Esther Faber

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.29 FRANK HARTZELL

From: Frank Hartzell
To: albionbridge@DOT
Subject: My public comments on the Albion River Bridge project.
Date: Thursday, September 5, 2024 4:46:44 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

To Caltrans:

My name is Frank Hartzell. I am a freelance writer who lives in Cleone, CA.
As a reporter, I don't normally comment on environmental documents myself, leaving that to the parties. But the Albion Bridge documents here lack the specifics I need to do a report. Caltrans does not seem to be negotiating in any way with the community or offering them any chance to input or to negotiate for public access to the beach, longer sidewalks or detailed mitigations of environmental and economic impacts. I ask questions about these

1 matters. I will not get into the question of whether the bridge should be replaced or not, just areas that the massive 2500-plus pages of documents seemed to have paved over with generalities and boilerplate material.

2 I would like to follow all these questions through the process and be able to find where they were read and answered or deemed irrelevant or whatever. How do I do that? I think an explanation of how those of us who have given input can follow our questions can be put in the executive summary. Can Caltrans do this?

3 Will Caltrans extend the sidewalks to Albion Ridge Road up to the post office and down to the river from there? Why is Caltrans not creating a sidewalk on at least one side of the Road from the new road at Albion River Inn up to Albion Post Office, then also all the way down to Salmon Creek Bridge and up the other side to Navarro Ridge Road? Then people could walk all the way through this village that Caltrans will be giving two new bridges at the end of the most massive bridge replacement project in local history and in much of the state- two giant bridges being replaced at once.

4 How many years total will construction be going on with the replacement of Albion and Salmon Creek Bridges happening one after another?

5 Has Caltrans ever considered an inland bypass for both of these bridges? If so can you provide details?

6 Will Caltrans please provide comparative National Bridge Inventory numbers or other ratings comparing all the bridges of the Mendocino Coast from Navarro to Ten Mile? I would like to read the ratings of the entire structure, deck, superstructure, and the rest that these ratings normally provide.

7 From a reader- Will Caltrans commit to working with the unions to be employed to ensure a

local hiring percentage?

8 From a reader- Would Caltrans consider tearing down and reconstructing the bridge for pedestrian use in another location if one could be found? Perhaps for use as a pedestrian bridge like the Pudding Creek trestle?

9 What changed? Caltrans negotiated with the community and presented a much wider range of bridges and talked about Reusing or refurbishing the old bridge, then suddenly, all discussion was off and Caltrans was basically offering the community nothing, no more public access as previously discussed, no inputs on colors of the bridge even, much less styles, no real upgrades to surrounding roads, no sidewalks beyond the bridge? Please explain what changed?

10 We'd like to see the bridge models for Albion Bridge before the community decides. Can that be done?

11 How much money does Caltrans have for bridge replacement on Highway 1 in its current budget cycle? Can Caltrans provide a list of bridges identified as needing to be replaced on Highway 1 from Mexico to Oregon? This would give the community and the media a perspective.

Is there a time limit on the funding for replacing the bridge? If so, please detail.

12 Public access- Caltrans will take the campground for 3 years but says it is unable to increase public access to the beach and river. I got the following answer from Manny Machado as to this question.
"There was a feasibility study completed in 2023 related to public access at the project location. The finding in the feasibility study was that "The Albion River Bridge project would not impact the existing access to Albion River if a new bridge were to be constructed. It is not practical to construct new public access routes and/or facilities to Albion River within the existing and proposed State right of way as part of the replacement bridge project."
If this is the answer it seems Caltrans is in violation of the Coastal Commission's demand that any development increases public access, especially one like this with such a huge environmental impact. Will Caltrans go back and look at doing more for public access?

13 The public meeting that was held was strictly scheduled for 1.5 hours and Caltrans talked half the time. Their talking was mostly to give general information. Caltrans had an excellent panel of experts to answer questions, but they, like the public got almost no time to talk. When the meeting ended only a dozen people had asked questions and more than 30 hands were up.
There is a video to review.
Does Caltrans maintain now this was a sufficient opportunity to take public input? Would

Caltrans consider scheduling a second meeting with the public in a larger place, with more time, and when the state has actual specifics to offer the public? Could you do this after you have chosen the alternative?
Caltrans asks public to choose between five Albion Bridge designs for replacement and nixes discussion of rehabbing the old bridge • The Mendocino Voice

14

It was difficult to envision the bridge from the online-only presentation of it. This will be the anchor for this small community for a century. What will it look like?. In the past models have been shown and large drawings on paper presented. The computer rendition didn't allow me to see much of anything specific, like how much sun a wider bridge will look from the narrow beach below. Or even anything different to envision. To me, this bridge is being chosen in the dark by Caltrans with pretty much zero community input. Will you go back and involve the community more? Can we see the model of your alternatives in person? Can we be shown what the bridge will look like from the beach?

15

Caltrans did promise to consider both replacing and renovating. I would agree with Norbert Dahl that the environmental documents need to include a full look that you must have done, not simply the summary appendix. This info must have been gathered beyond what we have. Will Caltrans add it in?

16

Caltrans' statements about eelgrass at the meeting were quite surprising. You might want to review the video. Described as being important to "fish". I have been following extensive research about eelgrass over the past few years. I have included eel grass mapping that shows the Albion River has a much better eel grass resource than the Noyo or Big River.

17

Will Caltrans provide an estimate of the cost of removing the old bridge to a dump? By that I mean proof that Caltrans has checked with a disposal facility that will accept this much wood and the type of wood shown. Can Caltrans provide a dollar estimate of the disposal cost and proof that it can be disposed of/ Such as a letter from a disposal facility?

If this wood is accepted anywhere pretty much, and as I was told it is low-grade toxic waste, will Caltrans consider reusing or recycling the bridge as a local museum or a smaller bridge? Being the last wooden highway bridge the community might wish for an opportunity to have something like London Bridge in Arizona. Will you ask them and help if desired?

If not, will Caltrans consider doing something more for the historic status as the state demands you do? The measures in the enviro documents seem very slim and much less than was offered in the past. For example, local people would love to have that wood and perhaps Caltrans could hello create a museum. If it is the type of wood the EIR describes (basically copper-treated wood like I have in my fence out back) will it use some of the

proven technologies (according to studies I have read) to remediate the toxic on-site or somewhere for community use?

With no motels or other accommodations in Albion, will Caltrans do something to provide accommodations for its work crews? As this will happen in the summer, hotels and motels in Mendo and Fort Bragg are already full. Since Caltrans will have workers on the two bridge sites for ?? 10 ?? years will Caltrans contribute to a housing effort, such as a city effort for workforce housing, perhaps in exchange for a block of motel rooms?

How toxic is the wood? The documents don't give enough detail, apparently because Caltrans is not considering anything but taking the bridge to the dump. But this is a historic bridge and the wood could be reused if Caltrans could resent more on the toxicity. One would guess that most of the toxins have leached out in 84 years of sun. True? Can you find out under your obligations to deal with historic structures? Or if more toxic than we have been led to believe, what risks does the wood present to workers and the environment? Can you provide more detail?

18

Why is Caltrans saying there are 5 options when the DEIR and other docs Caltrans has offered clearly negate the bridge being in the spot where the existing bridge is?

Would Caltrans consider going back to proposed bridges from the 2011-2016 time frame and using some of the more specific and less boilerplate environmental and economic documents presented at that time? It seems the community and myself as a reporter have very little to go in these documents despite their length.

--

Frank Hartzell
Fort Bragg, CA 95437
707-964-6174

Response to Frank Hartzell

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA and NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements. In addition, to ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period.

2. Responses to comments obtained during the public comment period are contained in this Final ED, which can be downloaded at the following website: https://www.albionriverbridgeproject.com/. Those who commented on the document will be provided a notice of its availability upon finalization of the ED.

3. A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. The report gave consideration to additional public access at the north and south ends of the bridge within the existing and proposed state right of way and determined it was impractical due to impacts on adjacent private property, sensitive habitats, and lack of practical design options that would comply with the Americans with Disabilities Act access requirements. For additional details regarding public access, see Master Response 4 (New Public Access) and ED Section 3.2.5, *Parks and Recreational Facilities*. Sidewalks to Salmon Creek Bridge and Navarro Ridge Road are outside the scope of the project and were not analyzed in the ED.

   All Build Alternatives would add shoulder width to and a separated pedestrian walkway across the bridge, which would provide safe and reliable multimodal access across the Albion River. Appropriate safety features and design refinements to access the separated pedestrian walkway on the west side of the bridge would be assessed and incorporated into the final design prior to construction.

4. The identified preferred alternative is anticipated to require three years to construct, and is programmed to start construction in 2027, while the Salmon Creek Bridge Replacement Project is anticipated to take four to six years with construction anticipated to start in 2032.

5. An alternative was considered that would have realigned State Route (SR) 1, relinquished the existing bridge to a local jurisdiction, and constructed a new bridge upriver (inland). See ED Section 2.5.3, *Realign State Route 1 and Replace with a New Bridge Upriver*.

   Neither Mendocino County nor any other local agency or jurisdiction have expressed an interest in assuming all rights, title, and interest of the state in and

to this segment of SR 1. Additionally, since this alternative would require constructing a new highway through largely undeveloped rangeland east of the community of Albion, this alternative could potentially have greater environmental impacts on several resources than the alternatives currently being considered, including land use, biological resources, water quality, noise, air quality, visual, transportation, induced vehicle miles traveled, and potentially archaeological resources. Therefore, this alternative was eliminated from further consideration.

6. Requests for bridge information can be made through Caltrans Public Records Act (PRA) request process. A PRA request can be made through this link: https://caltrans.mycusthelp.com/webapp/_rs/(S(qvm50crmx20cq15ze0gyszex))/supporthome.aspx.
7. FHWA regulations prohibit local hiring practices or preferences. However, it is anticipated that the workforce could include local Mendocino County residents.
8. Removing and reconstructing the existing bridge in an alternative location was not considered. The timbers of the existing bridge are hazardous waste; see Response 17. However, there was consideration of building a new bridge at a new location, or converting the existing bridge to a multimodal bridge and building a new bridge; see Section 2.5, *Alternatives Considered but Eliminated from Further Discussion Prior to Draft EIR//EIS.*
9. The bridge rehabilitation options referenced earlier in the process were considered and eliminated from further analysis. Reasoning for elimination of the rehabilitation options is provided in the ED (see Sections 2.5.5 and 2.5.6, and Appendix I, *Consideration of Rehabilitation Alternative*). For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   For details regarding public access, see Master Response 4 (New Public Access) and Section 3.2.5, *Parks and Recreational Facilities*.

10. Visual simulations were prepared using computer modeling techniques to depict the views as it would appear with the completed project and provided in the ED (see Section 2.2.6, *Unique Features of Build Alternatives*). In addition, a project website was available during the public comment period that contained visual simulations of the project alternatives, including an opportunity for the public to vote and comment on their preferred design. See https://www.albionriverbridgeproject.com/.
11. The ED identifies that the proposed project is included in the 2022 State Highway Operation and Protection Program (SHOPP) and is funded from the Bridge Rehabilitation and Replacement Program. Annual updates to the SHOPP, including fund estimates, can be found here: https://dot.ca.gov/programs/financial-programming/state-highway-operation-protection-program-shopp-minor-program-shopp.
12. For details regarding public access, see Master Response 4 (New Public Access) and Section 3.2.5.

13. To ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period.
14. See Response 10.
15. Rehabilitation was considered and eliminated from further analysis for failure to meet most of the basic project objectives. Reasoning for elimination of the rehabilitation options is provided in the ED (see Sections 2.5.5 and 2.5.6, and Appendix I). For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).
16. Impacts to eelgrass were assessed for the Build Alternatives. Under the identified preferred alternative (Design Option 2B – East Arch), temporary impacts to eelgrass are estimated to be less than 0.01 acre, and no permanent impacts to eelgrass are anticipated.
17. Samples of wood were collected from treated wood members of the bridge and tested for arsenic, chromium, copper, and semi-volatile organic compounds. Results showed that the majority of wood samples tested contained arsenic and chromium concentrations greater than the California hazardous waste thresholds. As it is considered hazardous waste it would not be for reuse by the public.

    Treated Wood Waste (TWW) from the bridge structure, utility poles, and guardrails would be generated, managed, and disposed of in accordance with measures described in Section 3.3.5, *Hazardous Waste/Materials*, including Standard Measures **HW-1** through **HW-4,** which would minimize potential impacts to human health and the environment due to accidental release of hazardous materials. To further lessen the potential impact of accidental release of hazardous materials, project-specific Measure **AMM-HW-5** would be implemented, which includes additional measures related to handling treated wood waste, including health and safety plan development and training.

    The proposed project is not anticipated to result in the need to construct new housing for construction workers. Construction workers may elect to stay in Albion, Fort Bragg, or other nearby areas, where they would commute to and from the construction site.

18. The alternatives under consideration in the Draft EIR/EIS included a No-Build (No-Action) Alternative and three Build Alternatives:

    - Alternative 1 (West Alignment; Design Options 1A and 1B)
    - Alternative 2 (East Alignment; Design Options 2A and 2B)
    - Alternative 3 (On-Alignment; Design Option 3A)

    Design Option 3A is generally on the same alignment as the existing bridge, sitting approximately 16 to 46 feet west of the existing bridge centerline.

After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

See Section 2.5, *Alternatives Considered But Eliminated from Further Discussion*, for details regarding other alternatives that were considered but eliminated from further discussion.

5.30 GABRIELLE LEVINE

From: Gabrielle L
To: albionbridge@DOT
Subject: Caltrans- Public comment for the Albion bridge
Date: Friday, September 27, 2024 9:53:13 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

I am a long-term Albion resident, and owner of the more remote campground under the Albion bridge. Here are the concerns that I share with our community.

1

We choose to live here because of the remote wild character of Albion. We like the fact that currently traffic slows down for the sharp turns at the bridge, and we do not relish anticipated higher highway speeds. The Mendocino Coast is highly scenic, not to be hurried through! Yes, the old bridge is glorious and iconic, but improving safety and removing hazardous waste timbers is also a good thing.

2

Removing the bridge footprint from the beach is a big plus to having a new single arch bridge. We would like to see the area under the bridge be restored to its original grade with local native plants and an ecologically functional estuary. There should be free public access to walk to the beach and to launch kayaks into the river. We need the view of the ocean from the bridge to be unencumbered. There should be safe pedestrian and wildlife crossing to get to the west side of the bridge. Please consider the nesting capacity of the new bridge as a nesting site for species such as purple martins, cliff swallows, peregrine falcons and bats. Purple Martins are a species of special concern, and have recently moved in at the river! I know that they love bridges, and that the Willits bypass has provided a home for a large colony of Martins. Please choose a design that optimizes habitat.

3

In addition, there is a remarkable mitigation opportunity adjacent to the bridge for eelgrass and coho habitat restoration in the river. There is half a mile of plastic seawall in the estuary above the bridge site. By removing this existing hardscape there could be salt marsh, pickle weed and glorious estuary habitat instead. Purple Martins are already nesting there. Restoration will benefit multiple endangered species plus increase coastal resiliency to sea level rise for all of us. This is a remarkable opportunity for Caltrans to take credit for some very good restoration work

We are counting on you to take this opportunity to leave our home and habitat better!

Thank you
Gabrielle Levine
Selkie Cove Restoration

Please do not quote me without full nuanced context, thanks

Response to Gabrielle Levine

1. The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

2. Areas of temporary disturbance under the bridge would be restored. A project-specific Revegetation Plan would be implemented that utilizes regionally appropriate native plants (see **AMM-AR-4**).

   For details regarding public access, see Master Response 4 (New Public Access).

   The environmental document reveals that the arch design options (including the identified preferred alternative, Design Option 2B – East Arch) allow expansive views beyond the bridge, with the arches framing the view of the river cove beneath them. The separated pedestrian walkway on the west side of the bridge would allow a safe, dedicated area to enjoy enhanced views of the ocean.

   Appropriate safety features and design refinements to access the separated pedestrian walkway on the west side of the bridge would be assessed and incorporated into the final design prior to construction.

   Your request to consider and potentially add elements to increase nesting capacity of the new bridge for purple martins, cliff swallows, peregrine falcons, and bats is noted; potential improvements would be evaluated as the project design is refined.

3. Removing the existing plastic seawall in the estuary is not a component of the proposed project.

   Mitigation for eelgrass is described under **AMM-BR-8**; additional detail is provided in Appendix D, Section D.3.3, *Compensatory Mitigation for Seagrass*. All necessary standards outlined in the California Eelgrass Mitigation Policy would be followed, including the development of a comprehensive mitigation and monitoring plan to ensure no net loss of eelgrass. Adaptive management may be needed for restoration efforts. Restoration to offset impacts to eelgrass would be developed in coordination with regulatory agencies.

   To mitigate for impacts to federally and state listed fish species, including coho salmon, Caltrans would pursue feasible mitigation opportunities to offset impacts. Potential options include improving habitat complexity or partially funding an important salmonid recovery project within the area (see **AMM-BR-10**).

5.31 GINETTA L. GIOVINCO

RWG LAW

Ginetta L. Giovinco

T 213.626.8484
F 213.626.0078
E ggiovinco@rwglaw.com

350 South Grand Avenue
37th Floor
Los Angeles, CA 90071
rwglaw.com

October 9, 2024

VIA ELECTRONIC MAIL

Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501
albionbridge@dot.ca.gov

Re: Albion River Bridge Project – Comments on Draft Environmental Impact Report / Environmental Impact Statement and Draft Section 4(f) Evaluation

Dear Ms. Walker:

This firm represents Mr. John Danhakl in connection with Whitesboro Farm, located in Albion, Mendocino County. We write to provide comments on the Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) Evaluation ("Draft EIR/EIS") prepared pursuant to the California Environmental Quality Act ("CEQA") (Pub. Resources Code § 21000, *et seq.*) and the National Environmental Policy Act ("NEPA") (42 U.S.C. § 4321, *et seq.*) for the proposed Albion River Bridge Project ("Project"). We look forward to the written responses that the California Department of Transportation ("Caltrans"), as lead agency under both CEQA and NEPA, will provide, including pursuant to the CEQA Guidelines (14 Cal. Code. Regs. § 15000, *et seq.*) ("CEQA Guidelines"), Section 15088.

1

Based on the comments set forth below, we do not believe that the Draft EIR/EIS in its current form complies with the requirements of CEQA or NEPA. We therefore request that Caltrans suspend any further consideration of the Project and revise and recirculate a Draft EIR/EIS that addresses the comments below (and all others received). We object to any further action by Caltrans on the Project until the necessary environmental review has been completed.

2

I. The Draft EIR/EIS Suggests Impermissible Post Hoc Rationalization

It is well established that "before conducting CEQA review, agencies must not 'take any action' that significantly furthers a project 'in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review for that public project."

(*Save Tara v. City of West Hollywood*, 45 Cal.4th 116, 138 (2008); see also CEQA Guidelines § 15004(b)(2)(B).) Unfortunately, it appears that Caltrans already has committed to approve the Project and has foreclosed any other alternatives, including full analysis of a bridge rehabilitation alternative (discussed further below) (*see* Draft EIR/EIS, p. 69) and a no-build alternative (*see* Draft EIR/EIS, p. S-iv.) The Draft EIR/EIS further confirms that the "proposed project is included in the 2022 State Highway Operation and Protection Program (SHOPP) and is funded from the Bridge Rehabilitation and Replacement Program." (Draft EIR/EIS, p. 1.) This impermissibly renders the environmental review process mere post hoc rationalization. We request that Caltrans confirm that all potential options for the bridge remain open during this environmental review and administrative process, and that Caltrans confirm that it has not pre-committed to replacement of the bridge, including through budgetary decisions that have been made to date.

3

II. The Draft EIR/EIS Fails to Provide a Stable and Finite Project Description

As explained in the Draft EIR/EIS, "Caltrans proposes to replace the existing Albion River Bridge (Caltrans Bridge #10-0136), which is located on State Route (SR) 1 in the community of Albion, Mendocino County, California. The project limits on SR 1 are from post mile (PM) 43.3 to PM 44.2." (Draft EIR/EIS, p. S-i.) The Draft EIR/EIS then explains that the Project "proposes three Build Alternatives and a No-Build Alternative." (Draft EIR/EIS, p. S-ii.) Alternative 1 (West Alignment) would construct a replacement bridge approximately 60 feet west of the existing Albion River Bridge centerline and includes two design options, Design Option 1A and Design Option 1B.) (Draft EIR/EIS, p. S-iii.) Alternative 2 (East Alignment) would construct a replacement bridge up to 190 feet east of the existing Albion River Bridge centerline and also includes two design Options, Design Option 2A and 2B. (*Ibid.*) Alternative 3 (On-Alignment [Half-Width]) would construct a replacement bridge approximately 16 to 46 feet west of the existing Albion River Bridge centerline and includes one design option, Design Option 3A. (*Ibid.*)

As a result, the Draft EIR/EIS contemplates a total of five different possibilities for what the Project could be, based on the various permutations of the Build Alternatives and Design Options. While CEQA contemplates some flexibility in project design, "[a]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185.) Failure to adequately describe the project undermines CEQA's general purposes, which include informing "governmental decision makers and the public about the potential significant effects of proposed activities" (CEQA Guidelines § 15002(a)(1).) By deferring any decision on what the actual Project is, the Draft EIR/EIS fails to comply with this mandate. Compounding this, the Draft EIR/EIS does not explain what the decision-making process is, who makes the final decision on a potential bridge replacement design, when that decision gets made, what the opportunity will be for public input and participation, or what the recourse is should members of the public not be afforded the ability to participate in that decision.

4

III. The Draft EIR/EIS Includes "Standard Measures" that Are Uncertain and Also Render Analysis of Potential Significant Impacts Incomplete

The Draft EIR/EIS includes approximately 50 different "Standard Measures," including subparts, which the Draft EIR/EIS contends are part of the Project and serve to avoid or minimize potential adverse impacts. (Draft EIR/EIS, p. 34.) There are two problems with the approach as relevant to this Project.

First, many of the Standard Measures are vague, leading to uncertainty regarding whether they actually will apply. (Draft EIR/EIS, pp. 34-44.) For example, AR-3 states, "*Where feasible*, the removal of established trees and vegetation would be minimized, *to the extent feasible*." (Draft EIR/EIS, p. 34.) The use of "where feasible," "if possible," and "when possible" in the Standard Measures occurs in AR-1, AR-2, AR-3, BR-2(A), BR-4(D), BR-4(E), and WQ-2. It is therefore not clear whether these measures will be implemented and enforced.

Second, of even greater concern, these Standard Measures appear to be used to justify conclusions of less than significant impacts in several impact areas, thereby denying decision-makers and the public the opportunity to understand the entirety of the Project's impacts. The Draft EIR/EIS states that the Project "would have less than significant impacts on air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire." (Draft EIR/EIS, p. S-iv.) This statement does not assert that the Project will have less than significant impacts with mitigation incorporated, but simply less than significant impacts, apparently relying on Standard Measures to reach this conclusion.

The Court of Appeal previously chastised Caltrans for this exact same approach in connection with a different project:

> "Caltrans compounds this omission by incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the 'avoidance, minimization and/or mitigation measures,' as they are characterized in the EIR, are not 'part of the project.' They are mitigation measures designed to reduce or eliminate the damage to the redwoods anticipated from disturbing the structural root zone of the trees by excavation and placement of impermeable materials over the root zones. By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA."

(*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 655-656.)

We request that the Draft EIR/EIS be revised to include a full and proper analysis of Project impacts in each impact area and do so without impermissibly compressing the analysis of impacts with potential mitigation measures, in order to ensure that all potential impacts are analyzed and disclosed.

5

IV. The Draft EIR/EIS Impermissibly Fails to Include an Alternative to Rehabilitate the Existing Bridge

As the Draft EIR/EIS correctly acknowledges, the existing Albion River Bridge is an historic resource:

> "The Albion River Bridge (10-0136, NRHP Reference #100001383) was previously determined eligible for the NRHP [National Register of Historic Places] in the Caltrans Historic Bridge Inventory update in 2004 and therefore was automatically placed on the CRHR [California Registry of Historical Resources]. Its period of significance being World War II/1944. The bridge was subsequently listed on the NRHP as of July 31, 2017 (National Park Service n.d.)."

(Draft EIR/EIS, p. 209.)

Despite this, the Draft EIR/EIS does not include a single alternative to rehabilitate the bridge. Instead, the Draft EIR/EIS announces in two short paragraphs that both design options for a rehabilitation alternative were rejected from further consideration. (Draft EIR/EIS, pp. 69-70.)

This approach violates CEQA. CEQA requires that an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project *but would avoid or substantially lessen any of the significant effects of the project*." (CEQA Guidelines § 15126.6(a).) This discussion must focus on alternatives "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (CEQA Guidelines § 15126.6(b).) The Draft EIR/EIS concludes that the Project will result in significant and unavoidable impacts to cultural resources due to removal of the bridge. (*See* Draft EIR/EIS, p. 486 ["changes to the Albion River Bridge, a NRHP/CRHR-listed resource, remain substantial and adverse even with the implementation of these measures, as the bridge would be removed and replaced under all Build Alternatives. Therefore, the impact would be significant and unavoidable even with mitigation"].) As a result, the Draft EIR/EIS must consider alternatives that could avoid, or lessen, the significant and unavoidable impact that the Project will cause in this regard.

The Draft EIR/EIS cannot avoid this obligation with the inclusion of Appendix I, *Consideration of Rehabilitation Alternative*. By rejecting a bridge rehabilitation alternative from full analysis and consideration the Draft EIR/EIS, Caltrans has deprived the public and decision-

makers of the opportunity to review, consider, and comment on that option. Furthermore, because the Draft EIR/EIS fails to include this as an alternative carried forward for full analysis, Caltrans has all but ensured that a rehabilitation option cannot be selected as the project to proceed.

Given the acknowledged importance of the bridge as a cultural resource, indeed one that is listed on both the National Register of Historic Places and the California Registry of Historical Resources, the public and decision-makers deserve more. They deserve, and CEQA requires, the inclusion of an alternative that evaluates rehabilitation of the bridge and avoids the significant impacts that the Project will cause.

6

V. The Draft EIR/EIS Fails to Support Its Conclusion that the Project is Consistent with Coastal Act and County Policies

The Draft EIR/EIS asserts that the Project is consistent with Coastal Act (Pub. Resources Code § 30000, *et seq*.) and County of Mendocino policies relating to visual and aesthetic resources, but fails to provide support for this conclusion.

The Coastal Act provides that the "scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance" and permitted development "shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas." (Pub. Resources Code § 30251.) Similarly, Mendocino County Coastal Element Policy 3.5-1. states that the "scenic and visual qualities of Mendocino County coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas and, where feasible, to restore and enhance visual quality in visually degraded areas." The Draft EIR/EIS claims that the Project will be consistent with these policies and would not result in any operational impacts because "all Build Alternatives would provide greater continuity of views of the ocean from Albion by removing the lattice towers" and the "addition of a pedestrian facility on the new bridge for all Build Alternatives would also enhance viewer opportunities." (Draft EIR/EIS, p. 104.)

This ignores that the bridge itself is an integral part of the scenic and visual qualities of the coastal area, and a contributing factor to what makes Albion special. By failing to acknowledge this, let alone analyze how the Project can be consistent with the Coastal Act or the County's Coastal Element policies, the Draft EIR/EIS fails to provide substantial evidence to support its conclusion.

7

VI. The Draft EIR/EIS Must Be Revised and Recirculated

CEQA requires that an EIR be recirculated when "significant new information is added to the EIR" prior to certification of the document. (CEQA Guidelines § 15088.5.)

Here, given the issues discussed above, to ensure that Caltrans complies with its mandate under CEQA to ensure that its "EIR [] demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action" (CEQA Guidelines § 15003(d)), the Draft EIR/EIS must be revised and recirculated for public review and comment.

We therefore object to any further action on the Project until the necessary and proper environmental review has been completed and the public has been provided a meaningful opportunity to comment on the revised EIR/EIS.

8

VII. Written Request for Notices

Pursuant to Public Resources Code section 21092.2(a), we intend that this letter serve as a written request for a copy of all notices that may be issued or filed related to this Project or any part or component thereof. Please provide all such notices to me at my address and email address listed above.

Very truly yours,

/s/

Ginetta L. Giovinco

cc: Client

12998-0002\3025851v1.doc

Response to Ginetta L. Giovinco

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements. No significant new information has been identified that requires recirculation pursuant to CEQA Guidelines Section 15088.5. Therefore, recirculation of the Draft EIR/EIS is not warranted.
2. Pursuant to 40 CFR 1502.14 and CCR Title 14 §15126.6, a reasonable range of alternatives was analyzed. The development of potential alternatives and determination of which would be carried forward, and those considered but rejected, was the result of a comprehensive and thorough process that included public input at multiple different points (see ED Section 5.5, *General Public*).

   Alternatives were identified based on past studies and comments received from stakeholders, including regulatory agencies and the community. The resulting alternatives were evaluated and refined through a sequential screening process (preliminary screening and initial screening) to identify the reasonable alternatives that best meet the proposed project's purpose and need.

   In accordance with Section 15126.6(c) of the CEQA Guidelines, the factors that may be used to eliminate an alternative from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation). See Section 2.5 for details regarding other alternatives that were considered but eliminated from further discussion.

   The alternatives under consideration in the Draft EIR/EIS included a No-Build (No-Action) Alternative and three Build Alternatives:

   - Alternative 1 (West Alignment; Design Options 1A and 1B)
   - Alternative 2 (East Alignment; Design Options 2A and 2B)
   - Alternative 3 (On-Alignment; Design Option 3A)

   The Project Development Team (PDT) comprised of interdisciplinary members of Caltrans and the Construction Manager/General Contractor (CM/GC) program, with representation from environmental, project management, project design, structures, right of way, and construction, met in October 2024, to compare and weigh the benefits and impacts of all feasible alternatives. The PDT identified Design Option 2B, the eastern spandrel arch with box girder approaches, as the

preferred alternative. See ED Section 2.4, *Identification of a Preferred Alternative*.

3. An accurate, stable project description pursuant to CCR Title 14 §15124 is provided in the ED (see Section 2.1, *Project Description*). The proposed Build Alternatives were described and analyzed in equal detail. Design Option 2B (East Arch) was found to be the environmentally superior alternative in the draft ED; however, selection of a preferred alternative was deferred until after consideration of comments received during the 90-day public circulation period.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. See ED Section 2.4, *Identification of a Preferred Alternative*.

4. Standard measures apply to all or most Caltrans projects and are not specifically developed in response to a specific project impact, including standard specifications relating to the discovery of archaeological resources, noise controls, and Best Management Practices (BMPs) and measures included in the Caltrans Standard Plans and Specifications or as Standard Special Provisions. They also include standard measures in compliance with laws, permits, agreements, guidelines, resource management plans, and resource agency directives and policies. These standardized or pre-existing measures allow little discretion regarding their implementation and are not specific to the circumstances of a particular project but are part of all Caltrans projects where they apply; as such, these measures are not CEQA mitigation measures. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5. The Build Alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.5-1 and other policies stated in Table 9 in Section 3.2.2, *Consistency with State, Regional, and Local Plans and Programs*. The identified preferred alternative (Design Option 2B – East Arch) would allow for expansive views beyond the bridge. The arch design frames the view of the river inlet for boaters and river recreationists, removing the extensive wooden beams and opening the view of natural coastal features. The arch design is also consistent with other bridges along the SR 1 coast.

   The proposed project would be consistent with the current highway user's view of rural scenic characteristics of the present roadway, and would maintain a two-lane, scenic rural highway once construction is complete consistent with the Local Coastal Plan.

6. No significant new information has been identified that requires recirculation pursuant to CEQA Guidelines Section 15088.5.

7. Comment noted. You have been included in the distribution list for the project.

5.32 GISELE DARCY

From: Gisele None
To: albionbridge@DOT
Subject: Albion Bridge
Date: Sunday, October 6, 2024 4:21:56 PM

1

EXTERNAL EMAIL. Links/attachments may not be safe.

It's dangerous and should be replaced.
Gisele Darcy

Response to Gisele Darcy

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.33 GREG YARMAN

From: Greg yarman
To: albionbridge@DOT
Date: Sunday, September 22, 2024 8:02:47 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Please do not let the people against this important issue win. I am paralyzed on my right side. I must use the bridge to see my doctor, to shop, to go to the hospital and many other things. Most importantly i use it to see and explore this amazing coast. Do not take this away from me and my family. I have lived here for over thirty years and i don't want them to take it away. Sincerely Greg Yarman.

Response to Greg Yarman

1. The environmental document acknowledges that a safe and reliable bridge over the Albion River is vital to the north and south sides of the community of Albion for residents, regional users of State Route 1, and tourists on the Mendocino Coast. The purpose of the proposed project is to provide a safe and reliable structure; the new bridge would have an anticipated service life of 75 years.

5.34 GREGORY ROSS

From: Greg Ross
To: albionbridge@DOT
Subject: Public comment on community impact and preservation of the historic Albion River bridge
Date: Monday, September 9, 2024 5:03:56 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Lisa Walker,

1

Please prioritize the rehabilitation of the existing bridge as a more community friendly and historically respectful alternative to building a new bridge. There is ample evidence that the current bridge can be maintained, and the impacts of building a new bridge are intolerable for all involved from humans to plants.

Sincerely,

Gregory Ross
PO Box 652
Albion, CA 95410
707-357-5405

Response to Gregory Ross

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document (ED) in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and *Appendix I, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including measures to address noise, air quality, traffic, and other community-related impacts. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments.

5.35 INGRID NOYES

From: Ingrid Noyes
To: albionbridge@DOT
Subject: Public Comment on Environmental Disruption and Preservation of the Historic Albion River Bridge
Date: Thursday, September 5, 2024 10:44:02 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Hello,
I am writing to object to CalTrans's plans to replace the Albion River Bridge. From all I have learned, it seems the only real reason this project is on the table is to create a huge amount of work and money for Cal Trans, doing what is by all other credible accounts an entirely unnecessary job. The existing bridge is beautiful, historic, structurally sound, and much loved. Leave it alone! Maintain it, add pedestrian walkways if needed, but work with the existing bridge. The immense project that is proposed is so destructive in so many ways, there is just no justification for it at all. Please stop with this plan, forget about a new bridge, just maintain the one that's already here. It's cheaper, and better for all concerned, from the local residents to the tourists to the salmon and other wildlife and the general ecology of the area all around.
Thank you for your consideration.
Sincerely,

Ingrid Noyes
Fort Bragg CA

Response to Ingrid Noyes

1. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. These deficiencies cannot be addressed through routine bridge maintenance. For additional details, see Section 1.4, *Purpose and Need*, of the environmental document (ED).

   We note your preference for the No-Build Alternative, involving only "repairs". Under the No-Build Alternative, the proposed project would not occur, and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative does not meet the proposed project's purpose and need. See Section 2.2.1, *No-Build (No Action) Alternative*.

   In the event your comment is referring to rehabilitation, rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The addition of a walkway to the existing bridge to provide pedestrian access is not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. However, a Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

5.36 JACOB PATTERSON

From: Jacob Patterson
To: albionbridge@DOT
Subject: Comment on DEIR For Albion bridge project
Date: Thursday, September 26, 2024 11:41:31 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Caltrans,

1

I am writing to object to the Alternatives section in the DEIR omitting an alternative evaluating the feasibility of a rehabilitation project alternative using the existing bridge andadding cantilevered pedestrian and bicycle facilities as well as metal railings that resemble the existing wooden railings along the drive surface. If Caltrans wants to eliminate this option as infeasible or not accomplishing enough of the project objectives, it needs to not just assert that is the case and otherwise ignore the issue, it needs to actually analyze this situation in the EIR. This is in line with prior commitments from Caltrans as well as the clear and unequivocal direction from the Coastal Commission. Until this alternative is analyzed in detail and compared to the proposed project that is preferred by Caltrans, the DEIR is not legally adequate and should be challenged as such. In the meantime, please revise the current draft to address this glaring omission.

Regards,

Jacob Patterson
Fort Bragg, CA

Response to Jacob Patterson

1. The environmental document was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA/NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   We note your preference for rehabilitation. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The addition of a walkway to the existing bridge to provide pedestrian access is not a viable option, MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. Failure to address the need for a standard bridge rail that meets current safety impact loading requirements is one of the many project objectives that the rehabilitation options fail to satisfy.

   A Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

5.37 JAN DESIPIO

From: Jan DeSipio
To: albionbridge@DOT
Subject: Public Comment on Noise Impact and Preservation of the Historic Albion River Bridge
Date: Friday, September 6, 2024 1:10:54 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Liza Walker,

1

Among my many concerns about the destruction of the historic Albion bridge and planned construction of a generic copy cat bridge is my **extreme** concern for the noise level that will be suffered by the residents of Albion Village. And suffered is the word.

I lived next door to an earth moving project at our farm in Costa Rica. There were only two trucks being used, a bull dozer and back hoe. (Compare that to the immense number of pieces of equipment needed for the bridge replacement) In Costa Rica the constant ping ping pinging of the trucks, from 7am till 5pm, the braking, scraping, dumping nearly drove us and our neighbors out of our minds. We all had to temporarily relocate. There was no way to tolerate the constant, constant noise level. Now you are asking the residents of Albion Village to live with unbearable, constant noise for what, 2 to 5 YEARS! How can you possibly justify inflicting that "punishment" on village residents?

I know a village resident who is hoping to sell his home within the next year. What does he say to potential buyers? "Oh, please buy my beautiful house, enjoy it while you can, because you won't be able to tolerate living there for a 2 to 5 year period as soon as the Albion Bridge Replacement Project begins". What do you say to those who rent out their homes to visitors? "Sorry if you depend on that income to be able to make it, just give us 2 to 5 years, and good luck?"

If it were necessary to tear down our bridge that would be one thing, but we all know there is a viable alternative. We all know this. I urge you all to consider rehabilitating and preserving our historic, beautiful bridge.

Sincerely
Jan DeSipio

P.S. We live six and a half miles up Albion Ridge. We can often hear sounds of the ocean coming up Salmon Creek. All Albion residents will be impacted by this massive construction project. PLEASE hear our concerns and reconsider.

Response to Jan DeSipio

1. The proposed project would not have significant noise impacts. Construction and associated noise would be temporary, and the project would implement minimization measures to reduce noise impacts (see **AMM-NOI-1).** For additional detail regarding temporary noise impacts during construction, see Master Response 10 (Noise).

   We note your preference for rehabilitation. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.38 JANET EKLUND

From: Janet Eklund-Cook <eklundmuseum1910@peoplepc.com>
Sent: Sunday, September 8, 2024 7:56 PM
To: Walker, Liza M@DOT <liza.walker@dot.ca.gov>
Cc: hdaca@dot.gov
Subject: Albion River Bridge

EXTERNAL EMAIL. Links/attachments may not be safe.

BY ELECTRONIC MAIL

September 8, 2024
Caltrans Attention: Liza Walker liza.walker@dot.ca.gov
Office of Environmental Management
1656 Union Street
Eureka, CA 95501

Subject: Preservation and Rehabilitation of the Historic Albion River Bridge

Dear Ms. Walker,

1

For the past ten years or more Caltrans has given our Albion Community an option of Preservation-Rehabilitation/Replacement of the Albion River Bridge. Now it has been decided it can only be 'Replacement'. This is truly disrespectful to our Albion Community as well as the Historic Albion River Bridge.

Speaking of disrespect, the 'Public meeting' held on August 13, 2024 at the Whitesboro Grange in Albion did not give a large enough space for all persons to join inside the room. The meeting was not long enough to listen to the many persons left requesting to speak. The questions asked were not given complete answers.

There is a Professional Engineer, Abolhassan Astaneh-Asl, Ph.D., P.E. that has said there is absolutely no engineering or economical reason to replace the Albion River Bridge.

There are two other Professional Engineers, Robert L. (Ben) Brungraber, P.E., Ph.D. and Richard J. (Dick) Schmidt, P.E., Ph.D. that have said the Albion River Bridge is not in need of immediate or near-term replacement and that it is in remarkably good condition thanks to its well-conceived structural design, high-quality timber materials, and effective connection detailing.

Again I ask that you give this Albion River Bridge the Preservation and Rehabilitation it deserves.

Sincerely,

Janet Eklund
eklundmuseum1910@peoplepc.com
P.O. Box 186
Albion, CA 95410

ec: Katie Everett, Project Manager Katie.Everett@dot.ca.gov
Jaime Matteoli, Corridor Manager jaime.matteoli@dot.ca.gov
Matthew Yosgott Deputy Director of SB 1 Programming Matthew.Yosgott@catc.ca.gov
California Division of the Federal Highway Administration hdaca@dot.gov
Julianne Polanco, California State Historic Preservation Officer julianne.polanco@parks.ca.gov

NOTE: HARD Copy ✓ℓ

BY ELECTRONIC MAIL

October 9, 2024
Caltrans Attention: Liza Walker liza.walker@dot.ca.gov
Office of Environmental Management
1656 Union Street
Eureka, CA 95501

Subject: Preservation and Rehabilitation of the Historic Albion River Bridge

Dear Ms. Walker,

2

Attached please find my photographs of portions of the Albion River Bridge showing clearly Cal Trans has not repaired the pot holes on the Albion River Bridge.

One of my first photos taken of the pot hole in the North bound lane at the South end of the ARB July 29, 2019 and I personally reported to Cal Trans that this was in need of repair. (this is not the only report to Cal Trans)

Five years later the same pot hole has not been repaired properly.
Attached please find my photos taken Sunday October 6, 2024.

Attached please find my photo taken this past Monday October 7, 2024 showing clearly the scuppers are clogged and maintenance is neglected.

This shows a lack of repair and maintenance for 'five years'. Cal Trans needs to do its job correctly.

For the past ten years or more Caltrans has given our Albion Community an option of Preservation-
Again I ask that you give this Albion River Bridge the Preservation and Rehabilitation it deserves.

Sincerely,

Janet Eklund
eklundmuseum1910@peoplepc.com
P.O. Box 186
Albion, CA 95410

Four photos attached via email (hard copy to follow)

ec: Katie Everett, Project Manager Katie.Everett@dot.ca.gov
Jaime Matteoli, Corridor Manager jaime.matteoli@dot.ca.gov
Matthew Yosgott Deputy Director of SB 1 Programming Matthew.Yosgott@catc.ca.gov
California Division of the Federal Highway Administration hdaca@dot.gov
Julianne Polanco, California State Historic Preservation Officer julianne.polanco@parks.ca.gov

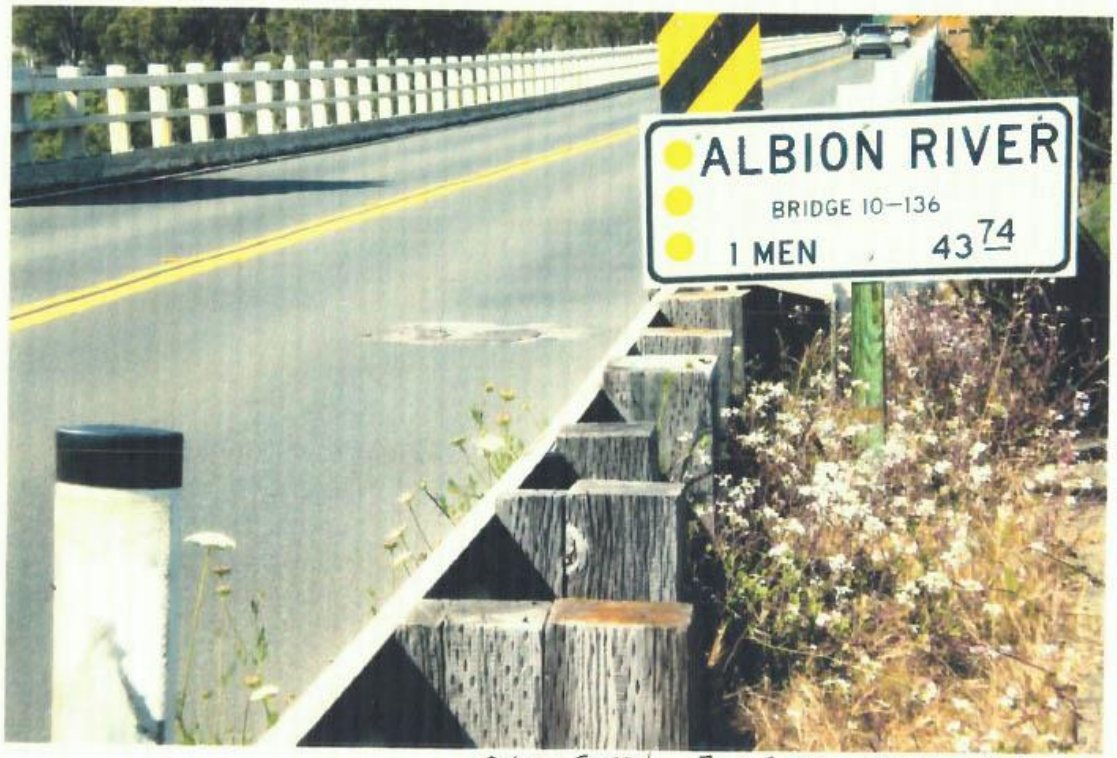
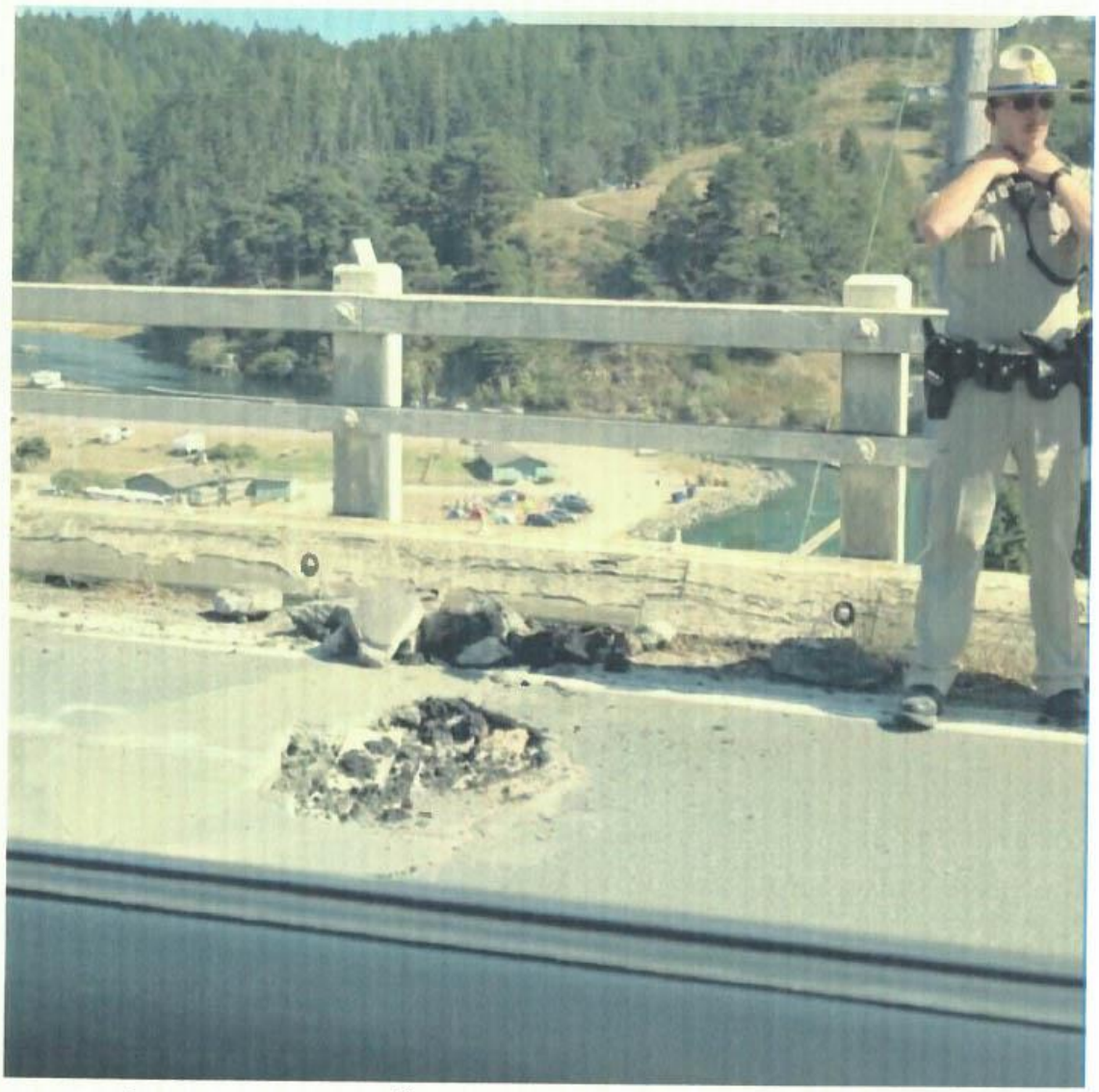
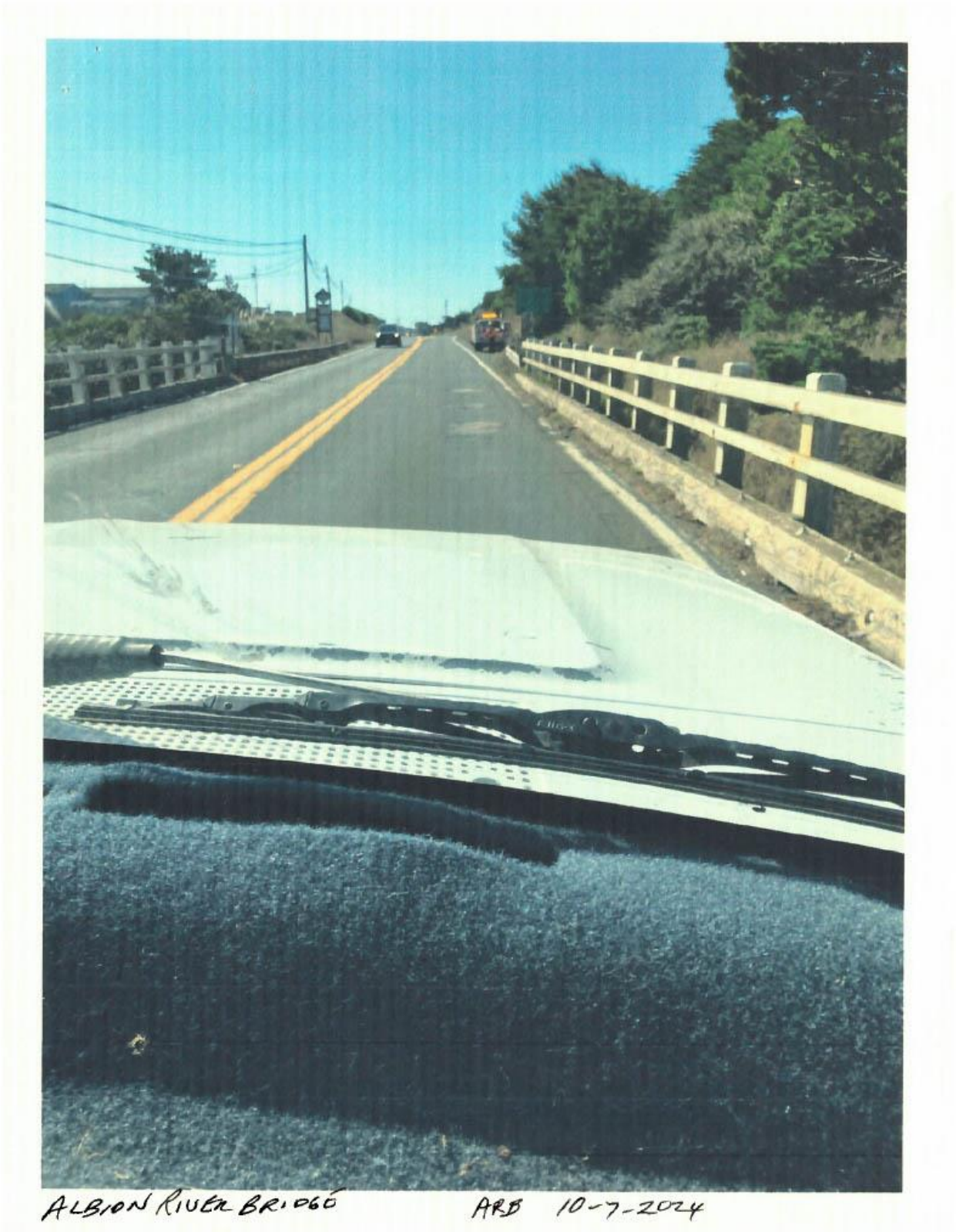


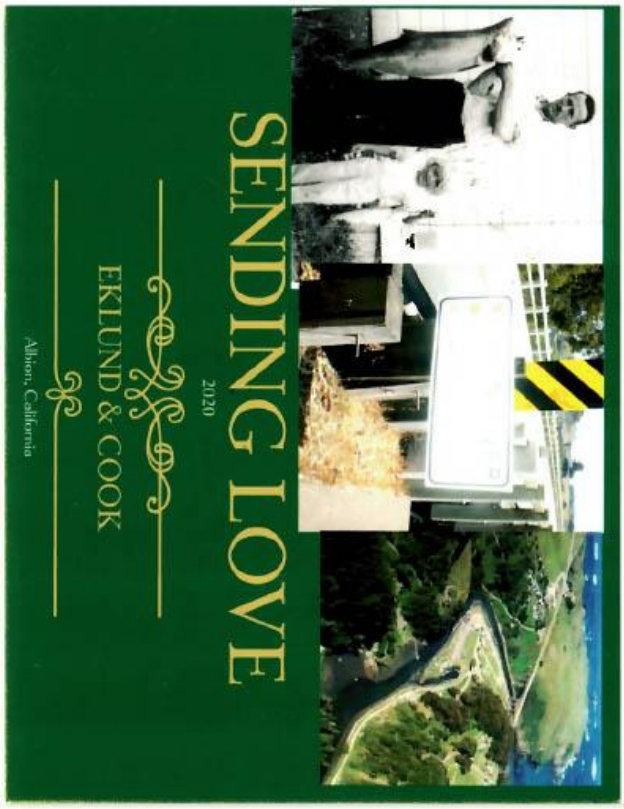
PHOTO TAKEN 7-29-19 APPROX 2 P.M.



ALBION RIVER BRIDGE 10-6-2024

ALBION RIVER BRIDGE 10-6-2024


ALBION RIVER BRIDGE
ARB 10-7-2024


SENDING LOVE
2020
EKLUND & COOK
Albion, California

Derek Magdalik / Fotomendo

Response to Janet Eklund

1. To ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period.

   The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need,* of the environmental document (ED).

   We note your preference for rehabilitation. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and *Appendix I, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. Comments noted and the photographs have been included in the administrative record. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.39 JEANETTE RASKER

From: Jeannette Rasker
To: albionbridge@DOT
Cc: Robert Cutler
Subject: Public Comment on Community Impact and Preservation of the Historic Albion River Bridge
Date: Thursday, September 5, 2024 6:38:09 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

I hope you are reading all these comments with an open mind and heart!

1

I am writing to address the significant, unmitigated community impact of the Albion River Bridge Replacement Project. The Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17).
Then add the additional impact on our commutes, the noise and pollution, possibly creating environmental hazards, from dust, trucks, exhaust, thus impacting our community for years to come.

I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigated impacts on the natural and human environment. Preservation would minimize community disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area.

I have not seen any serious efforts from CalTrans to deeply consider rehabilitation as the primary goal and consideration.
The bridge should only be replaced IF rehabilitation and maintenance is NOT an option!
CalTrans has NOT proven that!

Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).

Sincerely, and respectfully,
Jeannette Rasker
jrasker1@gmail.com
12 year resident in Pacific Reefs, Albion.

On a more personal note:

We are already going to be intensely impacted by the replacement of the Salmon Creek Bridge. OK, so maybe indeed in terms of the Salmon Creek Bridge there are safety issues.
I will grant you that.

However, as you can see I am choosing my battles here and am fighting to keep and maintain the Albion Bridge!

We, in the Pacific Reefs area, will have to put up with the huge clean up effort (LEAD contamination), now necessary because of mistakes made in the past, by CalTrans.
This truly is a MESS, which will impact us for years to come, including possible new environmental impacts!

After that we on Pacific Reefs will have to deal with a bridge replacement over Salmon Creek, and the impacts on our entrance and exit to Pacific Reefs, for many years beyond the clean up!

The overall planning for the overhaul of HWY 1 corridor from the Navarro Ridge Road area now underway, through the greater Albion is truly DEVASTATING for this community.
And will deeply effect us for a 10-12 year period of time!!!!

And where does this plan leads us?!?!
I, for one, have not learned how this 10 year plus series of projects of road widening, and bridge replacements is going to ADD to our quality of life!!!!

Yes, likely good for walkers and bikers, in the short run…..but wider roads invite faster drivers, who then in the end have to slow way down to manage the scenic drive towards Mendocino?!? How good is that?!?!

Sent from my iPad

Response to Jeanette Rasker

1. The proposed project would not permanently block public access to the Albion Campground and, pending right of way negotiations, certain Albion Campground facilities may remain open to visitors (at the owner's discretion). Visitors would use the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives*, or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional details regarding public access, see Master Response 5 (Public Access During Construction).

   A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including controls to protect air quality and minimize noise impacts. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments, and Master Responses 9 (Air Quality) and 10 (Noise).

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document (ED) Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The proposed project is consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.8-6 and other Policies stated in Table 9 in Section 3.2.2, *Consistency with State, Regional, and Local Plans and Programs.*

5.40 JEREMY ISENBERG

From: Jeremy Isenberg
To: albionbridge@DOT
Subject: comments
Date: Wednesday, August 28, 2024 3:57:58 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I am a part time resident of Mendocino. I am a licensed CE in California, undergraduate and Phd degrees in Civil and Structural Engineering, a member of the US National Academy of Engineering and an Adjunct Professor of Civil and Environmental Engineering at Stanford. I was also president of the company that won the bridge type selection competition and performed 30% design for the self-anchored suspension span of the new Bay Bridge. During the previous review of Albion bridge I had several discussions with Frank Demling and colleagues, who shared with me detailed drawings and some preliminary estimates of the fundamental frequency of longitudinal vibration of the current bridge. Purpose of our conversation was that if I was better informed perhaps I could help locals think more rationally about the project. Turned out I wasn't much help, Covid came and public interest in the project was suspended.

While I am in complete agreement with the decision to replace the bridge, my acquaintance with residents helps me to understand their resistance. Less important is the nostalgia that some have for the existing bridge. It is their only bridge and they don't see why it cannot be maintained indefinitely. They do not have the perspective of the bridge owner, who has dozens of bridges to maintain, responsibility for public safety and limited resources. Also motorists will become reconciled to the inconvenience. More important is the impact on local businesses, especially Albion River Inn, and a few homeowners. Your decision regarding alignment will create winners and losers. There is no avoiding this dilemma, but perhaps the impact can be mitigated.

Regarding mitigation, I draw your attention to advances in modular design. While perhaps more easily adapted to steel than to concrete, modularity would be helpful in this case for several reasons. Chief among these would be a remote casting yard with components trucked to the site for erection. I notice that you intend the approach spans for the arch to be post-tensioned, probably segmental. Maybe this philosophy could be expanded to other parts of the bridge. A senior bridge designer I know has adopted modularity as an element of his office's design and promotes the idea that modularity is consistent with sustainability, especially for maintenance. If nothing more, it would be good public relations and might actually have a better result.

Good luck with the project. I look forward to watching the progress.

Dr. Jeremy Isenberg PE, PhD, NAE, Dist. Memb. ASCE, F. SEI
240 Polhemus Ave.
Atherton, CA 94027
650-368-2605

And
10400 William St.
Mendocino, CA 95460
jeremy.isenberg@outlook.com
510-529-1134 (cell)

Response to Jeremy Isenberg

1. We note your support for bridge replacement and your suggestions for a modular bridge design. The identified preferred alternative is Design Option 2B (East Arch), which is a concrete spandrel arch with box girder approaches on an east alignment. The Build Alternatives are cast-in-place concrete due to the complex staging and access limitations of the site. Design refinements, including type selection decisions (such as use of precast sections for parts of the replacement bridge), would be assessed and incorporated into the final design prior to construction.

5.41 JERRY

From: Jerry C
To: albionbridge@DOT
Subject: Albion River Bridge Public Comment
Date: Sunday, October 6, 2024 6:24:09 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

To whom it may concern:

I am a resident of Mendocino who has only slight interest in the Albion Bridge project.

1

As it stands I support the construction of a new span that meets seismic requirements. However, I do have some concern over disposition of the old bridge.

2

To wit, that old bridge is of treated wood construction. That means treatment with various chemicals to prevent organisms from damaging the wood or to prevent normal rot and weakening from exposure to the environment.

The EIR does not appear to address disposal of the components of the old bridge, nor does it address mitigation of potential contamination from the foundational soils. While the EIR does address choices with regard to disposal of water or other effluent the disposal of contaminated timbers is not addressed.

Jerry

Response to Jerry

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

2. Treated Wood Waste (TWW) from the bridge structure, utility poles, and guardrails would be generated, managed, and disposed of in accordance with measures described in Section 3.3.4, *Hazardous Waste/Materials*, including Standard Measures **HW-1** through **HW-4,** which would minimize potential impacts to human health and the environment due to accidental release of hazardous materials. To further lessen the potential impact of accidental release of hazardous materials, project-specific Measure **AMM-HW-5** would be implemented, which includes additional measures related to handling treated wood waste, including health and safety plan development and training.

   Further, contaminated soil encountered during construction would be properly managed in accordance with local, state, and federal requirements. All removal work would be carried out in a manner to limit exposure of workers and the environment to the contaminants.

5.42 JERRY OGLESBY

From: smedley
To: albionbridge@DOT
Subject: Albion Bridge Project
Date: Wednesday, September 18, 2024 3:02:49 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1 Hello. I am Jerry Oglesby. My family and I live on Albion Ridge Road in view of the Albion Bridge. I was dismayed to learn that CalTrans is no longer considering building a span west of the current bridge while retaining the current bridge for a pedestrian crossing. I recognize that costs of upkeep, modifications, and many other complications affected your decision.

2 I was further dismayed to learn that nowhere in your plans was included enhancements for public access to Albion River Beach, which were discussed in the beginning, and I am certain could be achieved at moderate cost to the overall project budget and would be a mega-benefit to the community. Both beaches at Albion River and Salmon creek have no public access. This is the number one drawback to residing here that we don't have free access to either beach that would be within walking distance from the village, if you could walk there. It is all blocked by private lands and gated roads. The ability to walk across the Albion Bridge AND get to the beach is really a huge benefit to cross off the potential community benefits list for this project.

3 Of the plans submitted, my family feels that the most attractive option is the semi-circular truss supported bridge built to the west of the current bridge you intend to dismantle. Thank you for your consideration.

Sent from Yahoo Mail for iPhone

Response to Jerry Oglesby

1. We note your preference for converting the bridge to a pedestrian bridge. Rehabilitation and conversion of the existing bridge to a pedestrian bridge was considered but eliminated from further discussion as described in the environmental document in Section 2.5.5, *Rehabilitate and Convert Existing Bridge to Multimodal Bridge and Build a New Bridge*.
2. A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. The report gave consideration to additional public access at the north and south ends of the bridge within the existing and proposed state right of way and determined it was impractical due to impacts on adjacent private property, sensitive habitats, and lack of practical design options that would comply with the Americans with Disabilities Act access requirements.

   However, the proposed project would provide a structure with improved bridge approaches and a 75-year service life, which would ensure safe and reliable coastal access near the Albion River. Further, the project proposes to improve Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and realigning the road. For additional details regarding public access, see Master Response 4 (New Public Access).
3. We note your secondary preference for Design Option 1B (West Arch). After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B was found to be the environmentally superior alternative and is similar to Design Option 1B in that it involves a spandrel arch that will for allow expansive views beyond the bridge.

5.43 JIM HEID

From: Jim Heid
To: albionbridge@DOT
Cc: Jim Heid
Subject: Attached: engineer"s review of 2023 inspection report
Date: Monday, September 9, 2024 9:49:20 AM
Attachments: Dr. Astaneh Letter to Albion Bridge Stewards-September 9-2024.pdf

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Please find attached a letter from Abolhassan Astaneh-Asl, Ph.D., P.E. regarding flaws in the most recent Albion River Bridge bridge inspection report.

Our group, Albion Bridge Stewards, asked Dr. Astaneh to review the inspection report and offer his review. He did so as a pro bono advisor. Dr. Astaneh is a world-class professor emeritus from UC Berkeley.

https://ce.berkeley.edu/people/faculty/astaneh

The attached letter casts serious doubt on the accuracy of Caltrans' assessment of the condition of the historic Albion River Bridge. He writes, in part:

There are severe problems in the 2023 Inspection Report and many violations of the FHWA National Bridge Inspection Standards (NBIS) requirements, making the 2023 Inspection Report almost invalid. Many statements and notes in this inspection report that declare the bridge's current condition as "Poor" are not factual and contradict the data collected by the Caltrans inspectors and reported in the later pages of the 2023 Inspection Report.

The attached letter further validates our contention that Caltrans needs to withdraw the current inaccurate and incomplete Draft EIS/EIR and fix its many flaws, including — most important — adding a detailed review of the impact of rehabilitation of this historic structure.

Please add this email and its attachment to the public comment file for the Albion River Bridge project.

Additional detailed comments on the DEIS/DEIR are forthcoming today.

Thank you,
Jim Heid

TO: Mr. James Heid, Albion Bridge Stewards

FROM: Abolhassan Astaneh-Asl, Ph.D., P.E.

Date: September 9, 2024

Subject: Review of the 2023 Caltrans Inspection Report
on the Albion River Bridge

Dear Mr. Heid:

As you requested, I have completed a review of the Caltrans Inspection Report on the Albion River Bridge, dated November 27, 2023. I will refer to this inspection report in this letter as the 2023 Inspection Report. There are severe problems in the 2023 Inspection Report and many violations of the FHWA National Bridge Inspection Standards (NBIS) requirements, making the 2023 Inspection Report almost invalid. Many statements and notes in this inspection report that declare the bridge's current condition as "Poor" are not factual and contradict the data collected by the Caltrans inspectors and reported in the later pages of the 2023 Inspection Report.

The existing condition of bridges is rated by the state departments of transportation as "Good," "Fair," or "Poor," following the provisions of the National Bridge Inspection Standards (NBIS) and using the data collected during the bridge inspections. To provide the public with the utmost safety by efficiently using available transportation funds, Congress, in budgeting and FHWA and state DOTs in carrying on the engineering work, focus on repairing, retrofitting, or replacing the bridges rated "Poor" following the NBIS. Bridges with a poor condition rating have the highest priority for repair, retrofit, or replacement using transportation funds.

For Albion River Bridge, it is clear that, for reasons that are not known to me, Mr. Warren L. Peterson, a Caltrans engineer licensed in California as a Professional Engineer in civil engineering, who has signed and put his stamp on the 2023 Inspection Report, has ignored almost entirely the inspection data that primarily he has collected himself on the Albion River Bridge, which clearly shows that the bridge is in a "Fair" close to "Good" condition rating, and has assigned the condition rating of "Poor" to this bridge. This action by the Caltrans inspector violates the third Canon of the Code of Ethics for Professional Engineers of the National Society of Professional Engineers (NSPE) (https://www.nspe.org/resources/ethics/code-ethics) that all Licensed Professional Engineers should abide. The 3rd Canon of NSPE states: "*Engineers, in the fulfillment of their professional duties, shall issue public statements only in an objective and truthful manner.*"

In the remainder of this letter, first, I provide a summary for non-bridge engineers on what the National Bridge Inspection Standards (NBIS) are and how bridges, using the provisions of the NBIS, are rated as Good, Fair, or Poor. Then, using only the inspection data in the 2023 Inspection Report, I will show that the Albion River Bridge is in "Fair" close to "Good" condition rating, and designating it as in a "Poor" condition is incorrect.

With the inspection data in the 2023 Inspection Report and being a state and federally-registered historic place, the demolition and replacement of the Albion River Bridge will not only violate the National Bridge Inspection Standards, a federal law, but an irresponsible act of spending limited taxpayers' transportation funds on a bridge that is in Fair to Good condition instead of attending the 1,527 bridges in California that according to the FHWA's National Bridge Inventory (NBI) are rated Poor and in need of repair, retrofit or replacement. The number of bridges with a Poor condition rating in California is down from 1,536 in 2020 to 1,527 in 2024, which means over the past four years, Caltrans has only brought nine (i.e., 0.5%) of the 1,536 Poor-rated bridges to Fair or Good condition.

1. A Brief Background on the Bridge Inspection Program

Almost all engineering standards in the U.S. are created by committees of professionals in the specific field that the standard applies to and then put into the public comment process until all comments are resolved (accepted or rejected) and the standard becomes official and used. Bridge inspection standards are an exception. An act of Congress established the National Bridge Inspection Standards in response to the 1967 tragic collapse of the Silver Bridge, where 46 people perished. In 1968, the U.S. Congress required the Secretary of Transportation to establish these standards. Federal Highway Administration (FHWA) established the National Bridge Inspection Program and published the first National Bridge Inspection Standards (NBIS) in 1971. The NBIS has been updated periodically, and the latest standard is 2022 in the Federal Register: https://www.federalregister.gov/documents/2022/05/06/2022-09512/national-bridge-inspection-standards.

The condition ratings of the three major parts of the bridge are established as Good, Fair, or Poor using the inspection data in the inspection reports. Then, if at least one of the three components has a condition rating of Poor, the bridge will be assigned a condition rating of Poor.

The three main parts of bridges are the Deck, Superstructure, and Substructure. I have shown these three parts of the Albion River Bridge in Figure 1 below. The Deck is the structure that supports the roadway. Usually, there is an asphalt overlay on the Deck. The Albion River Bridge's Deck is made of timber and has a two-inch asphalt overlay. The Superstructure is the structure that supports the Deck. For the Albion River Bridge, the Superstructure consists of two steel trusses in the main span over the river and timber trusses in the other 33 spans, which are called approach spans. The Substructure is the structure, such as piers, columns, foundations, pile caps, and piles. For the Albion River Bridge, the Substructure is made of concrete 4-legged

towers to support the main span and timber towers to support the trusses of the approach spans. The towers are supported on the foundation system.

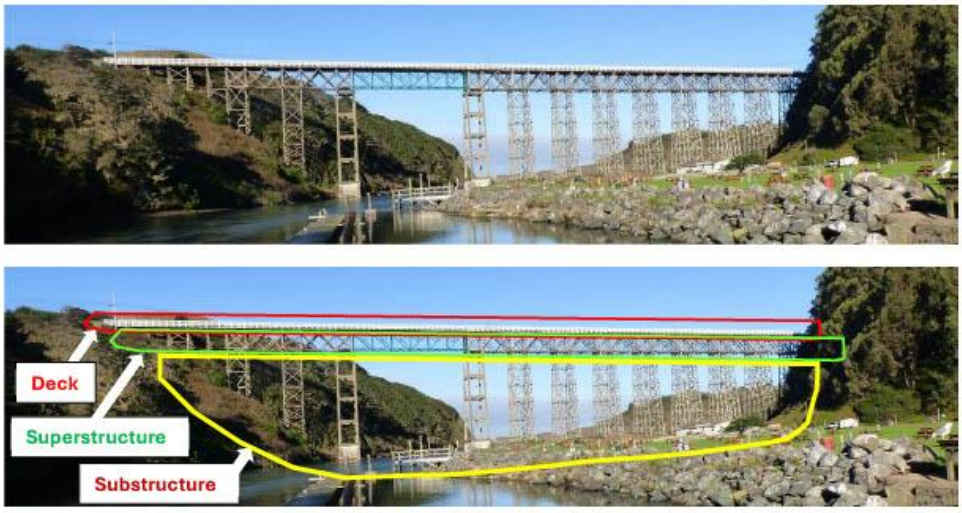


Figure 1 Deck, Superstructure, and Substructure of the Albion River Bridge

To establish the condition rating of the Deck, Superstructure, and Substructure, the State DOTs, Federal agencies, and other bridge owners use the information and data in the "Inspection Reports," such as the 2023 Inspection Report for Albion River Bridge, on the existing condition of "Elements" of each three parts of the bridge. The elements are the individual beams, columns, bolted connections, welded connections, piles, foundations, etc.

With the above explanation, it is clear that the condition rating of the three components of a bridge is based on the inspection data on the condition of the "elements" collected by the state DOT and reported to the FHWA, which places the data on the website of the National Bridge Inventory (NBI) publicly.

National Bridge Inspection Standards (NBIS) have clear and objective guidelines and standard provisions for collecting and reporting inspection data in the Inspection Report. All bridge inspectors must strictly follow these guidelines to have a consistent rating of more than 615,000 bridges on public roads in the U.S. that are subject to the NBIS.

After the condition rating of the three parts of a bridge, namely the Deck, Superstructure, and Substructure, are established, if the condition rating of at least one of the three components is Poor, the bridge will have a condition rating of Poor.

2. Review of the Caltrans 2023 Inspection Report on Albion River Bridge

Below is the first part of the 2023 Inspection Report. After Bridge Location Information, a summary of the bridge condition rating is provided. This is the most crucial part of the 2023 Inspection Report. On the left column in lines 1, 2, and 3, it states that the condition ratings of the Deck, Superstructure, and Substructure are (5 Fair), (4 Poor), and (4 Poor), respectively. Assigning condition ratings to the Deck, Superstructure, and Substructure should be based on the inspection data gathered during the inspection. The above assignments of condition ratings <u>are not</u> based on the inspection data provided in the remainder of the 2023 Inspection report.

Department of Transportation - Division of Maintenance — Structure Maintenance & Investigations

Caltrans

BRIDGE INSPECTION REPORT
Other Inspection

BRIDGE NO.	STRUCTURE NAME	INSPECTION DATE
10 0136	ALBION RIVER	November 27, 2023

BRIDGE LOCATION INFORMATION

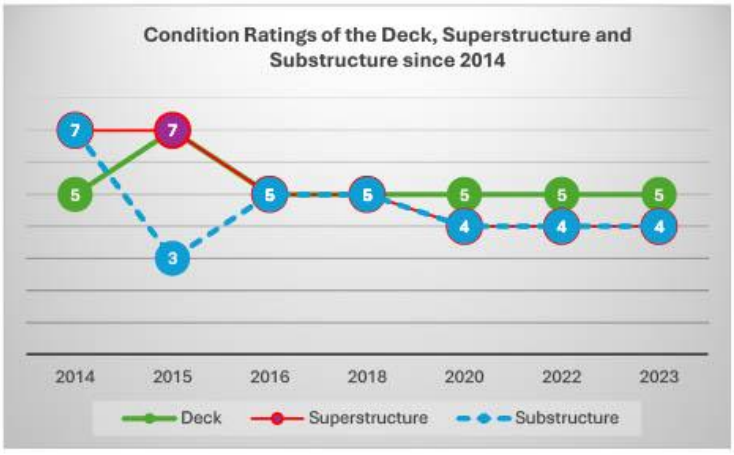
(9) LOCATION	01-MEN-001-43.74	(7) FACILITY CARRIED			STATE ROUTE 1
(11) POSTMILE	43.74	(6) FEATURE INTERSECTED			ALBION RIVER
(16) LATITUDE	39°13'30.32"	(5) INVENTORY RTE(ON/UNDER)		ON	131000010
(17) LONGITUDE	123°46'09.83"	(104) ON NATIONAL HIGHWAY SYSTEM			NOT ON NHS

STRUCTURAL HEALTH CONDITION SUMMARY INFORMATION

(58) DECK	(5 FAIR)	DECK AREA (M)^2	2,540
(59) SUPERSTRUCTURE	(4 POOR)	SUFFICIENCY RATING	31.3
(60) SUBSTRUCTURE	4 POOR	PAINT CONDITION	100
(62) CULVERT	N N/A (NBI)	STRUCTURALLY DEFICIENT (SD) STATUS	SD
(67) STRUCTURE EVALUATION	4 MINIMUM TOLERABLE	(113) SCOUR	5 STABLE W/IN FOOTING OR PIL

PHOTOGRAPH IDENTIFICATION

The chart below shows Deck, Superstructure, and Substructure condition ratings variations. In 2014, the rating of the Deck was 5, and the Superstructure and Substructure rating was 7. In 2014, after the author questioned assigning the rating of 5 to the Deck, Caltrans indicated widespread rot in the Deck. However, after actual testing and sampling of the Deck, Caltrans



4 of 7

in 2015, agreed that the Deck was in good condition and raised the rating of the Deck to 7. However, at this time, the condition rating of the Substructure dropped from 7 to 3. It is almost impossible for a bridge condition rating to drop from 7 to 3 in one year without experiencing a major damaging event such as a strong earthquake or major flood. This indicates somewhat arbitrary assignment of the condition ratings to the three main parts of the bridge.

Then, a year later, in 2016, all three ratings were 5 (Fair) until 2020, when the rating of the Superstructure and Substructure dropped to 4(Poor). This assignment of Poor condition rating to the Superstructure and Substructure was after the new changes in the National Bridge Inspection Standard were introduced, which meant if the condition rating of one of the three main parts of the bridge is less than 5, the condition of the entire bridge is rated as Poor, which makes the bridge eligible for Federal funding for repair, retrofit, and replacement.

The reason I state that the assignment of Poor condition rating to the Superstructure and Substructure is not based on actual inspection data is shown in the three tables below. The tables are similar to those currently used by the FHWA, state DOTs, including Caltrans, and other bridge owners to report the condition of the "elements" of the bridges. The 1st column of the table has the name of the "element" of the inspected bridge. I have made minor changes in the element names to make it easily understood by non-bridge engineers. The 2nd, 3rd, and 4th columns have the element condition ratings as "GOOD," "FAIR," "POOR," and "SEVERE." The numbers entered in the tables below are all from the 2023 Inspection Report for the Albion River Bridge.

Deck Elements Condition States

Element Name	Condition State			
	1	2	3	4
	GOOD	FAIR	POOR	SEVERE
Asphalt (m^2 = square meter)	2,354	3	0	0
Timber Deck (m^2)	2,473	17	59	0
Timber Railing (m =meter)	759	0	200	0
Joint Pourable Seal (m)	9	8	0	0
Joint Open Expansion (m)	17	0	0	0
Total %:	95%	1%	4%	0%

The condition rating assigned to the Deck part of the Albion River Bridge in the 2023 Inspection Report is Fair, while 95% of its elements are in Good, 1% in Fair, and 4% in Poor. The assignment of Fair conditions to the Deck seems arbitrary and not based on the actual inspection data in the report. Based on the inspection data, the condition rating of the Deck would be 6 or even 7. In the 2014 inspection report, the percentage of Good, Fair, Poor, and Severe were 89%, 0%,11%, and 0%, respectively, yet the condition rating assigned to the Deck

was 7. Using the inspection data in the 2023 Inspection Report, as summarized in the above table, the condition rating of the Deck would be a 6 or 7.

Superstructure Elements Condition States

Element Name	Condition State			
	1	2	3	4
	GOOD	FAIR	POOR	SEVERE
Timber Beams, Stringers, and Truss Elements(m)	4,350	690	0	0
Steel Truss Members (m)	71	0	0	0
Number of Steel Truss Gusset Plates	40	0	0	0
Number of Bearings Supporting Steel Trusses	4	0	0	0
Total % :	88%	12%	0%	0%

The condition rating assigned to the Superstructure in the 2023 Inspection Report is Poor, while as the table above shows, 88% of the elements of the Superstructure are in Good, 12% in Fair, and no element in Poor or Severe condition. The assignment of Poor rating condition to the Superstructure is not based on the actual inspection data in the 2023 Inspection Report but rather an arbitrary assignment. Note that there is not even one element of the Superstructure that is Poor or Severe. Then, the question is, how is the entire Superstructure in poor condition when not even a single element is in poor condition? Using the inspection data in the 2023 Inspection Report, as summarized in the above table, the condition rating of the Superstructure would be a 6 or 7.

Substructure Elements Condition States

Element Name	Condition State			
	1	2	3	4
	GOOD	FAIR	POOR	SEVERE
Number of Reinforced Concrete columns	6	2	0	0
Timber Column	21	11	0	0
Timber Pier Cap	10	59	0	0
Reinforced Concrete Pile Caps	120	0	0	0
Reinforced Concrete Pier Cap	33	0	0	0
Reinforced Concrete Pile	1	0	0	0
Timber Pile	1	0	0	0
Total %:	74%	26%	0%	0%

The condition rating assigned to the Substructure in the 2023 Inspection Report is Poor, while 74% of its elements are in Good, 26% in Fair, and no element is in Poor or Severe condition. Again, for whatever reason, it is clear that the assignment of Poor rating condition to

the Substructure is not based on the actual inspection data in the 2023 Inspection Report but rather an arbitrary assignment. Similar to the Superstructure case, the question is how the entire Substructure is in Poor condition while not even a single element of it is in Poor condition? Based on the inspection data in the 2023 Inspection Report, as summarized above, the condition rating of the Substructure should be a 5 or 6.

In addition to the condition ratings in the 2023 Inspection Report that cannot be justified using the actual inspection data, some other statements and notes are equally unjustified and not based on the bridge's current condition. There is more than ½ page of argument in the 2023 Inspection Report that in 2012 it was discovered that 50-70% of the bolts connecting the timber members were corroded and had to be replaced. Caltrans engineer Mr. Warren L. Peterson, who signed and stamped the 2023 Inspection Report, continues to argue that there were 5,000 bolts to be replaced at that time. Even though many bolts in the joints of timber elements of the Albion River Bridge were corroded, the corrosion was, for the most part, due to a lack of maintenance on the part of Caltrans. The corroded bolts were replaced with new bolts more than a decade ago, and since then, they have been in good condition. Using the corrosion problem that no longer exists, Mr. Peterson argues that there is a potential for corrosion of the bolts in the future; therefore, the bridge needs to be replaced with a concrete bridge. The National Bridge Inspections Standards require that the inspectors report the current condition of the bridge elements, not the past condition that has already been improved.

3. Conclusion

Caltrans engineer who has signed and stamped the 2023 Inspection Report of Albion River Bridge has almost completely ignored the actual inspection data in the inspection report and subjectively and arbitrarily has assigned the condition rating of Poor to the Superstructure and Substructure of the Albion River Bridge. The assignment of an unjustified poor condition rating to the Superstructure and Substructure automatically has made the Albion River Bridge rated as a bridge in poor condition. As I explained earlier in this letter, the ratings of Poor assigned to the Superstructure and Substructure are arbitrary and not based on actual inspection data.

It is necessary that Caltrans investigates the activities regarding the inspection and condition rating assignment of the Albion River Bridge and take necessary steps to correct the 2023 Inspection Report for the Albion River Bridge, where the condition ratings of the Deck, Superstructure, and Substructure are based on the actual element inspect data contained in the report. With my knowledge of the bridge, the element inspection data contained in the 2023 Inspection report seems to be reasonably accurate. The element inspection data should be used to assign the condition ratings of the Deck, Superstructure, Substructure, and the whole bridge.

Respectfully submitted

Abolhassan Astaneh-Asl, Ph.D., P.E.
(www.berkeley.edu/~astaneh)

7 of 7

Response to Jim Heid

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA and NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   It is noted that the letter provided by Albolhassen Astaneh-Asl is addressed to the commentor (Jim Heid) and does not comment on the sufficiency of the ED, but instead comments on a Caltrans 2023 Bridge Inspection Report (2023 Report)[15].

   The letter provided by Albolhassen Astaneh-Asl does not contain new or independent data concerning the bridge's structural condition and is not based on a hands-on inspection. Instead, the letter critiques the condition ratings that Caltrans has assigned to the bridge deck, superstructure, and substructure. The letter does not acknowledge the role of engineering judgement in assigning the condition ratings. Further, the letter attempts to summarize the findings of the 2023 Report, but in doing so, omits critical data and mischaracterizes the report's conclusions. For example, page 6 of the letter states, "no element [of the substructure] is in Poor or Severe condition". However, page 13 of the 2023 Report clearly identifies that elements of the substructure (i.e., trestle-timber) are rated "severe".

   The 2023 Report, as well as the 2021 and 2022 Reports referenced in the ED, were prepared by a registered civil engineer in the State of California under a current and valid license. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards), and the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The 2023 Report is based on sound engineering judgement, accurately identifies the condition of the bridge, and confirms the structural and seismic deficiencies that give rise to the proposed project's purpose, need and objectives.

[15] The ED does not incorporate the 2023 Report (see Chapter 8, *References*). However, the findings of the 2023 Report are substantively the same as the 2021 and 2022 Bridge Inspection Reports, which are referenced in the ED.

5.44 JO BRADLEY

From: Jo Bradley
To: albionbridge@DOT
Subject: Albion Bridge
Date: Monday, September 9, 2024 4:13:08 PM
Importance: High

EXTERNAL EMAIL. Links/attachments may not be safe.

To All,

1 Right now you have disrupted our lives in multiple places along Highway One, 128 and 20. You are doing this all at the same time. To add the disruption of the Albion Bridge is even worse.

2 I do not understand the reluctance of CalTrans to retrofit this iconic bridge. Do the Retrofit! There is no need for a new bridge. I understand the need for the retrofit.

3 Our safety will also be threatened as you will be splitting our Fire Department in half. The chances of fire and medical emergency service greatly outweigh the chances of the bridge going down or a huge earthquake.

Thank You very much –

Jo Bradley RVT
Little River, CA

Response to Jo Bradley

1. Your comment on traffic disruption is noted. The traffic control for the proposed project is standard, involving flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2).** For detail regarding traffic control, see Master Response 7 (Traffic and Emergency Response).
2. The environmental document extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards).

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document (ED) Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).
3. Emergency response agencies, including the Albion-Little River Fire Protection District (ALRFPD), would be notified of the proposed project construction period and would have access to SR 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles across the bridge at all times (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes. For additional detail regarding emergency services, see Master Responses 7 (Traffic and Emergency Response).

5.45 JOEL GINSBERG

From: Joel Ginsberg
To: albionbridge@DOT
Subject: Public Comment on Traffic Disruption and Preservation of the Historic Albion River Bridge
Date: Wednesday, August 28, 2024 9:33:55 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Ms. Walker:

I am writing to express my opposition to the removal of the Albion River Bridge. I live on Middle Ridge Road, off of Albion Ridge Road.

1

While I grew up here and love the bridge, I understand that change is inevitable. That said, there are other important reasons to choose to rehabilitate the bridge rather than replace it.

Chief among these is access. My son is in high school in Mendocino. My work, grocery shopping, and other errands take me to Mendocino and Fort Bragg several times a week. It is a 25 minute drive one way to Mendocino and 40 minutes to Fort Bragg. I am very concerned about lengthy delays.

I am most concerned about times when the bridge would be shut down entirely. The route to Fort Bragg via Flynn Creek Road and Comptche is 90 minutes one way.

Please consider the crushing burden this detour would have on Albion residents and choose a solution that better meets the needs of the local community.

Thank you.

Joel Ginsberg
32800 Middle Ridge Rd
PO Box 154
Albion, CA 95410

Response to Joel Ginsberg

1. Traffic control for the proposed project is standard and similar to traffic control associated with other Caltrans projects; the majority of delays are anticipated to be up to 15 minutes for flagging and shorter times, typically up to 5 minutes, when a temporary signal system is in use. Total delays are likely to be shorter at off-peak times. Intermittent traffic control, which would have delays up to 30 minutes, would only be used as needed, such as for setting up the temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). The one anticipated overnight closure would be timed to cause the least disruption to the public. See Master Response 7 (Traffic and Emergency Response) for more information on traffic control during construction. See also Master Response 1 (Rehabilitation) for information on impacts associated with the rehabilitation options.

5.46 JOHN DANHAKL

From: Tutwiler, Betsy on behalf of Danhakl, John
To: albionbridge@DOT
Cc: Laura.Schiller@dot.gov; Ginetta Giovinco
Subject: FW: RE: CALTRANS "ALBION RIVER BRIDGE PROJECT" DEIR-DEIS
Date: Monday, September 9, 2024 12:25:36 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

By Electronic Mail
albionbridge@dot.ca.gov

September 6, 2024

Caltrans
Attn.: Liza Walker
Chief, Eureka Office, Caltrans North Regional Environmental
1656 Union Street
Eureka, California 95501

RE: CALTRANS "ALBION RIVER BRIDGE PROJECT" DEIR-DEIS
(SCH# 2015042016)

Dear Ms. Walker,

1

Thank you for this opportunity to comment on Caltrans' fatally flawed draft Environmental Impact Report and Environmental Impact Statement (DEIR-DEIS, dated June 2024) concerning Caltrans' environmentally and financially indefensible scheme to replace the Albion River Bridge (ARB). The Albion River Bridge Project, as outlined in the DEIR-DEIS, seeks to replace, rather than sustainably maintain and preserve, *as required by State and Federal regulations*, the Federal and State-listed historic and iconic Albion River Bridge on Federal and State protected scenic rural California Coast Highway 1, in Albion, coastal Mendocino County. Out of respect for the thousands of people's lives that will be severely disrupted by a project of this magnitude, out of respect for the taxpayers who ultimately pay for these projects and to be consistent with the priorities and requirements established by the laws of the United States and California, the DEIR-DEIS must be restarted to properly assess ***the rehabilitation of the iconic Albion River Bridge as not simply a feasible project alternative but as the preferred alternative***.

2

My comments reflect my personal knowledge of the Albion River Bridge, the town of Albion, as well as the 67 mile road between Cloverdale (turnoff off to Mendocino from Highway 101 for those transiting from the Bay Area) and Mendocino and the 100 mile stretch of Highway 1 between Bodega Bay and Mendocino, arguably the most scenic stretch of coastline in the country, all of which will be negatively impacted by this project. They also reflect my ten years of involvement in Caltrans' review of alternatives which have included, at my expense, hiring experts on environmental impacts, bridge design, repair and maintenance, legal and other matters.

By training and profession, I am an economist and investor. I recognize a valuable asset when I see it and I understand the rationale related to large capital projects. I own Whitesboro Farm, a horse and cattle sanctuary, south of the ARB and my home in the county is located to its north. The ARB (which accommodates traffic volume of only 3,000 vehicles per day on average) constitutes my – and more importantly the community's and public's - only practical bicycle and driving route through Albion - whether for work, church, recreation, education, or shopping upcoast or downcoast from the village. As well, the Albion River Bridge serves as a major visitor gateway to coastal Mendocino County from the Bay

Area.

For a decade I've been interacting with Caltrans as it relates to what was initially characterized as a project to study rehabilitation and replacement alternatives. During this time, I've been struck by the ever-changing, evolving rationale favoring replacement which has been from the start Caltrans' bias. But here's the bottom line. Replacement of the bridge will not make that crossing safer and it will be a colossal waste of taxpayer funds. The construction of a replacement bridge will *materially disrupt the lives of thousands of people for 4-6 years*. Many of the mostly elderly people in the impacted areas *won't even live to see the end of a project of this duration*. Businesses north and south of a replacement project will fail, and the real question will be how many in the immediate area will be able to hang on…my bet - few. Today businesses in the area describe 40-60% revenue losses from even short duration road closures. The impact of a 4-6 year replacement disruption is unimaginable. Real estate values totaling in the $100s of millions will be suppressed for the duration of the project.

3

A replacement project, which will have substantial negative impact on the community and Californian's seeking to enjoy the Northern Coast for 4-6 years must have a Valid Purpose. No Valid Purpose, singularly or in total, have been proffered come close to supporting disruptions, damage, and expenses of the magnitude of these projects. But let's review a few of the arguments being advanced by Caltrans:

4

- Economic: Caltrans has suggested that the costs of maintaining the existing structure are prohibitive. For the 20 years from 2001 through 2020, an average of $354,421.85 per year was allocated to bridge maintenance and upgrade. Preliminary estimates suggest that the cost of a new bridge might be upwards of $150 million. That suggests a payback of 423 years…far longer than the life of whatever would replace the current structure, an economic investment which defies logic. Any suggestion otherwise represents an insult to the taxpayers of this country. Economic rationale provides no Valid Purpose for replacement.

5

- Function/safety—overview: The DEIR-DEIS indicates that recent bridge inspections rate ARB as being in "poor and deteriorating condition." Caltrans, it should be noted, has consistently misrepresented conditions for the ARB. For example, a decade ago Caltrans asserted to the community that the deck underlying the asphalt was rotting (one of the myriad and shifting arguments advanced favoring replacement). However, when the asphalt was replaced 6 or 7 years ago, there was *found to be no significant rot* in the underlying decking - the boards were fine. Experts Dr. Brungraber and Dr. Schmidt in 2018 observed that the ARB was in good condition and noted that if it was maintained appropriately, it could serve its intended purpose for the foreseeable future. ***And Caltrans agrees***. As recently as August 13, at a meeting in Albion, Caltrans assured the public that the Albion River Bridge is perfectly safe. Safety related to potential bridge failure provides no Valid Purpose for replacement.

6

- Function/safety—load rating: The DEIR-DEIS indicates that the ARB has a "low load rating" but omits to disclose that the ARB *has no posted vehicular weight limit* and fails to consider that the narrow, winding roads surrounding Albion cause heavy and large vehicles to access Mendocino from the north. Load rating does not prove a Valid Purpose for replacement.

7

- Function/safety—Road width: The DEIR-DEIS advances the existing ARB's lack of "continuous, safe and separate access for bicyclists and pedestrians" as a basis for replacing the ARB. This notion defies logic. You don't spend $150 million replacing 970 feet of roadway to provide bike lanes when the roads 10 miles either side of the ARB have no bike lanes and have narrow shoulders and curves that severely compromise sightlines, in short, miles of roads presenting far greater cumulative hazards that could be addressed for a fraction of the $150mm proposed here. In addition, the DEIR-DEIS fails to take into account speed limits and human nature. I'm a cyclist. There is nowhere on Highway 1 I feel safer than that ARB…because the ARB is straight with excellent sightlines, and vehicles traverse it at far slower speeds versus the winding roads on

either side…I'd estimate 25-30mph on the straight bridge deck versus 40-50+mph on the winding roads either side of the ARB. In 80 years, there has not been a single fatality on the ARB despite in excess of 50 million cumulative crossings. Injuries and crashes will be far more likely given the higher speeds if the ARB is replaced, especially given the Albion Little River Road intersection at the north end of the ARB. Road width does not provide a Valid Purpose for replacement.

8

- Function/traffic disruptions: The DEIR-DEIS suggests that "full bridge closures" for "inspections, maintenance, repairs or safety" might disrupt traffic unless the ARB is replaced. This one has me baffled. Suggesting a 4–6-year replacement project requiring absolute, long duration, consequential and non-stop lane closures, bridge closures, noise, time and disruption to avoid infrequent and theoretic traffic disruption of an inconsequential nature associated with maintaining the status quo…Caltrans can't be serious here? Amelioration of traffic disruptions associated with ordinary course maintenance of the exiting bridge is not a Valid Purpose for replacement.

9

- Safety—Fracture critical: It has been noted several times that the steel truss section is fracture critical, meaning that the failure of a single element might cause catastrophic failure. The engineers I've hired have carefully examined the steel truss, as have Caltrans' own inspectors. They note that the steel truss section is a repurposed railway bridge, *designed to carry trains with 100+ ton locomotives*, far, far greater loads than required at the Albion River crossing. The steel truss may be fracture critical, but it is safe, over-designed and over-built for its current purpose. The Bay Bridge, which was replaced at a cost of over $6.5 billion is fracture critical. If fracture critical is okay for the brand-new Bay Bridge, why should the ARB be held to a different standard? The fracture critical status of the existing bridge is not a Valid Purpose for replacement.

10

- Safety—seismic: Drs. Brungraber, Schmidt and Hassan Astaneh, a renowned expert in studying bridge failure, have all confirmed that the structure as designed, because of the inherent flexibility of wood, can tolerate significant seismic activity, consistent with or superior to concrete structures. They note that the steel truss system needs to be tied down to eliminate the potential for seismic damage. With that qualification (which Caltrans has so far partly addressed), seismic risk is not a Valid Purpose for replacement.

11

- Safety—Tsunamis: This one popped up right after Fukushima…a sensational rationale favoring replacement related to potential damage during a tsunami, with Caltrans' standard at the time being a 1000-year event! Caltrans' own engineers acknowledged that the ARB would survive such a tsunami. They *speculate* that the receding waters *might* pick up debris which *might* undermine the ARB. The ARB has survived, untouched, tsunamis up and down the coast, including the tsunami in 1964 from the Alaskan earthquake that wiped out Crescent City. The risk of tsunamis does not represent a Valid Purpose for replacement.

12

Environmental Impact—Without going through the presentation in detail, the DEIR-DEIS is beyond incomplete for several reasons. First off, we do not even know which replacement bridge is being proposed. What we do know is that whatever would be built would impact the environment in ways not addressed by the DEIR-DEIS. For example, without giving measure to transport and construction, the concrete required to build a new bridge will likely generate in excess of 100,000,000 pounds of CO_2. Detours totaling millions of miles and 100s of thousands of hours will inconvenience people and generate in excess of 1 billion pounds of CO_2. In addition, the deconstruction of the existing ARB will disrupt flora, fauna and marine life while potentially releasing tons of toxins associated with the current timber into the surrounding environment.

13

Economic Impact—The DEIR-DEIS dramatically understates the economic impact of 3-5 years of new bridge construction on local communities and the additional year or more spent dismantling and removing the ARB. A high percentage of the tourists coming from the Bay Area will avoid the construction zone, choosing other locations or a 25 mile longer trek via Highway 20. There are few inns or restaurants between Albion and Mendocino that are likely to survive given the duration and scope of the project. But it

will go farther than that. Coastal towns including Bodega Bay, Sea Ranch, Gualala, Point Arena, Manchester, Elk, Albion and Mendocino will all be impacted. Towns on State Highway 128 will be similarly impacted by 4-6 years of disrupted traffic flows. Thousands of people will be delayed.

14

History—The Albion River Bridge is the last wooden trestle bridge on the West Coast. It is a marvel of engineering and American ingenuity, constructed as it was during World War II when materials were in short supply. It is a National Registered historic treasure. It is the pride of Albion. Removing a symbol of this importance will be a local and a national tragedy. Replacement won't improve safety and it will be a colossal waste of money. Thousands will see their lives turned upside down and many of the elderly locals impacted by the project won't even live to see its completion given the 4–6 year duration of the project. To borrow from Joni Mitchell, let's not pave paradise. Let's honor history and do the responsible thing by rehabilitating the Albion River Bridge.

Thank you for your consideration,

John Danhakl
M: 310-567-6276
johngdanhakl@gmail.com

cc: Mr. Pete Buttigieg
Secretary, United States Department of Transportation
Attn: Chief of Staff Laura Schiller
Laura.Schiller@dot.gov

Ms. Elissa Konove
Administrator, US Federal Highway Administration, Sacramento
elissa.konove@dot.gov

Mr. Tony Tavares
Director, Caltrans
tony.tavares@dot.ca.gov

Mr. Matthew Brady
Director, Caltrans District 1
matthew.brady@dot.ca.gov

Ms. Liza Walker, Caltrans District 1
liza.walker@dot.ca.gov

Ms. Christine Asiata Rodriquez
Manager, State Clearinghouse, Governor's Office of Planning and Research
state.clearinghouse@opr.ca.gov

Ms. Ginetta L. Giovinco
Attorney, Richards Watson Gerson
ggiovinco@rwglaw.com

DISCLAIMER: This email (including any attachments) is intended solely for the person or entity to whom it is addressed and may contain confidential, proprietary or privileged material. If you are not the intended recipient, you are hereby notified that any use, dissemination,

distribution or copying of this communication is strictly prohibited. If you have received this email in error, please notify the sender immediately then permanently delete the email and all copies (including any attachments). This email (including any attachments) is not intended as an offer to buy or sell, or a recommendation to buy or sell, any security. All email sent to or from the Leonard Green & Partners, L.P. ("LGP") email system is subject to archiving, monitoring, and/or review by LGP personnel.

Response to John Danhakl

1. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA and NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. Your comments on environmental setting and potential impacts to local businesses and real estate are noted. The ED acknowledges that a safe and reliable bridge over the Albion River is vital to the north and south sides of the community of Albion for residents, regional users of State Route 1, and tourists on the Mendocino Coast. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct. The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchase of goods and services and employment of workers required for construction. Further, the proposed project is not anticipated to cause permanent changes that would alter regional economic conditions. For additional details regarding economic impacts, see Master Response 6 (Local Economy).
3. The purpose of the proposed project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in ED Section 1.4, *Purpose and Need*. The need for the proposed project has always been to address the deficiencies associated with the existing bridge.
4. As noted above, the project is needed to address the functional, safety, and structural deficiencies of the existing bridge. Under the No-Build Alternative, the proposed project would not occur, and maintenance would continue. However, the purpose and need of the project would not be addressed. Additionally, decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary, with associated costs.

   With regard to rehabilitation, rehabilitation would not be anticipated to lower maintenance costs. Neither rehabilitation option would achieve the same engineering performance as a replacement bridge. Additionally, bridge components would have shorter lifespans compared to a new bridge, requiring

an extensive ongoing maintenance program. The maintenance program would include periodic replacement of timber and connection hardware (e.g., shear rings and bolts), resurfacing of the bridge deck, and painting of the bridge's steel truss and rails. Further, rehabilitation does not maximize public investment at this location as rehabilitation alternatives would need major maintenance or replacement in as few as 10 years, compared to the 75-year lifespan of a replacement bridge, due to the shorter lifespan of bridge components.

Additionally, there is much uncertainty in rehabilitation projects as the extent of damage to certain bridge components due to the inaccessibility of certain bridge components. This uncertainty would have the potential to substantially increase the construction duration and associated traffic delays for the rehabilitation alternatives, increasing impacts to the traveling public.

Minimizing ongoing maintenance costs is one of the many project objectives that rehabilitation options fail to satisfy.

5. The 2021 and 2022 Bridge Inspection Reports, referenced in the ED, both rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics. See also Response 3 above.
6. The Albion River Bridge does not have a weight limit for legal trucks. However, the current vehicular live load carrying capacity of the bridge is not sufficient for routing most annual permit loads, such as oversize/overweight vehicles (e.g., mobile cranes, large tow-recovery vehicles, and many of the more "standard" permit trucks such as construction equipment haulers). The bridge is one of two locations on SR 1 that restricts permitted loads. See also the discussion on substandard live load carrying capacity in Appendix I. American Association of State Highway and Transportation Officials (AASHTO) and Caltrans' Seismic Design Criteria require that rehabilitated and newly constructed bridges meet current load rating design standards. Eliminating the existing bridge's structural deficiencies, including substandard live load carrying capacity, is one of the many project objectives that rehabilitation alternatives fail to satisfy.
7. The existing bridge deck is 26 feet wide, consisting of two 12-foot-wide travel lanes and 1-foot-wide shoulders. The deck does not meet the Mendocino County Land Use Policy (LUP) minimum paved shoulder width of 4 feet as feasible (LUP 3.8-6). The narrow shoulders do not provide additional recovery area for motorists and do not provide safe access for multimodal users.

   The bridge serves as a portion of the legislatively designated Pacific Coast Bike Route (PCBR) and serves as a planned component of the California Coastal Trail (CCT). The PCBR is an 1,800-mile cycling route the follows the west coast from Canada to Mexico, generally along State Route (SR) 1. The CCT is a network of public trails for walkers, bikers, equestrians, wheelchair riders, and others; the majority of the trail in Mendocino County is planned along the SR 1. Cyclists and

other multimodal users share lanes across the bridge with motorists, as there is no designated lane or sufficient shoulder for multimodal users. Caltrans' Director's Policy (DP) 37 establishes a policy that recognizes the multimodal users of the transportation system and requires all transportation projects to provide "comfortable, convenient, and connected complete streets facilities for people walking, biking…unless an exception is documented and approved" (DP-37, 2021).

Neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River. Providing safe multimodal access is one of the many project objectives that the rehabilitation options fail to satisfy.

8. For details regarding traffic-related impacts associated with the proposed project, see Master Response 7 (Traffic and Emergency Response).

   For details regarding traffic-related impacts associated with rehabilitation, see Master Response 1 (Rehabilitation).

   With respect to traffic impacts associated with on-going maintenance of the existing bridge, maintenance obligations are anticipated to increase over time and the risk of potential bridge collapse or failure would continue. Failure to minimize traffic delays associated with bridge inspection, maintenance, and repairs is one of the many project objectives that the rehabilitation alternatives fail to satisfy.

9. The existing bridge's main span lacks redundancy in its design and would be incapable of carrying loads across the bridge if there were to be damage to one or more of its steel members. Due to this lack of redundancy, the bridge is designated fracture critical. There is added risk and uncertainty to keeping a fracture critical bridge in service, even if it is extensively rehabilitated. If a fracture critical component were to fail, it could cause the bridge to collapse.

   The rehabilitation options would replace the main span with a manufactured steel deck truss of the same dimensions; however, the manufactured steel deck truss would not allow for redundancy in the design. Therefore, the bridge would remain fracture critical.

   Failure to eliminate the fracture critical condition of the truss main span is one of the many project objectives that the rehabilitation options fail to satisfy.

10. The bridge is seismically deficient as it is susceptible to catastrophic failure or "collapse" during an earthquake. The rehabilitation options would retrofit the bridge with restraining devices to make the bridge more resistant to failure in the event of an earthquake. However, a seismic retrofit still allows for a rocking motion in the bridge during an earthquake to dissipate energy and does not meet the same modern seismic performance standards of a new bridge.

Failure to eliminate seismic deficiencies is one of the many project objectives that the rehabilitation options fail to satisfy.

11. The existing bridge is located within an area subject to flooding as a result of tsunami inundation, storm surges, and sea level rise. As a result, the bridge is vulnerable to damage due to the closely spaced bridge supports, which have the potential to catch incoming or outgoing debris, causing damage to the bridge.

    The rehabilitation options would retain similar materials to the existing bridge and remain in generally the same configuration with multiple foundations in or near the low-lying area at Albion Beach, which would not be consistent with the State of California's adopted climate change adaptation strategies. Further, the Rehabilitation Only option would maintain the same bridge supports, while the Rehabilitation with Widening option would add additional bridge supports, exacerbating the potential for catching debris and damaging the bridge during tsunami and storm surge events.

    Failure to improve resilience to sea level rise, storm surges, and tsunamis is one of the many project objectives that the rehabilitation options fail to satisfy.

12. The ED discusses the proposed Build Alternatives in Chapter 2, *Project Alternatives.* Of the Build Alternatives, Design Option 2B (East Arch) has been identified as the preferred alternative. Greenhouse gas emissions associated with Design Option 2B are estimated to be 2,091 metric tons (see ED Table S-1).

    The project proposes one extended 10-hour closure, which would be overnight to cause the least disruption to the public. This closure would precede the traffic switch from the existing bridge to the replacement bridge. Motorists would have the option of using state routes to detour around the closure or may elect to use other routes to cross the Albion River, which are not on the state highway system, at their discretion. For more information on traffic control, see Master Response 7 (Traffic and Emergency Response).

    A comprehensive environmental analysis for the proposed project was completed. Standard measures and avoidance and minimization measures were identified to reduce impacts. Further, mitigation measures were identified for potentially significant impacts, including to biological resources. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level under CEQA.

    Treated wood waste would be managed and disposed of in accordance with measures described in Section 3.3.5, *Hazardous Waste/Materials*, including Standard Measures **HW-1** through **HW-4,** which would minimize potential impacts to human health and the environment due to accidental release of hazardous materials.

13. The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the

proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. Further, work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**).

For additional details regarding economic impacts and traffic impacts, see Master Responses 6 (Local Economy) and 7 (Traffic and Emergency Response).

14. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.47 JOHN JOHANSEN

7 September 2024

To whom it may concern,

Save the Albion River Bridge.

1 Northern California's scenic Highway One has two bridges listed on the National Register of Historic Places: the Albion River Bridge and the Golden Gate.

Our local historic treasure has served our Albion community for more than eighty years.

Restoration work could begin as soon as tomorrow by simply enhancing the ongoing Caltrans maintenance program.

2 The cost of restoration versus demolition and replacement would be less than half.

The disruption to our lives in Albion and the work of Caltrans would be much less considering: no major road reorientation, no placement of hundreds of tons of concrete on each side of Albion Cove, no transportation of 820,000 board feet of timber to a toxic dump, no major demolition, no land acquisition, no residential relocation, no loss of beach access and no organized opposition.

2.

Every element of this treated timber bridge is accessible for structural evaluation including the paved roadway. This asphalt surface is placed on tar on two layers of 3x12s placed diagonally in opposite directions on eighteen one thousand foot long Douglas fir 4x22 beams. The top layer of 3x12s is solid tongue and groove. The bottom layer of 3x12s is placed 1" apart to allow for inspection of the upper layer every 12".

3

The new pedestrian walkways would be designed as structural enhancements to compensate for any increased loading requirements and placed along each side of the existing bridge in direct alignment with the major structural elements below.

4

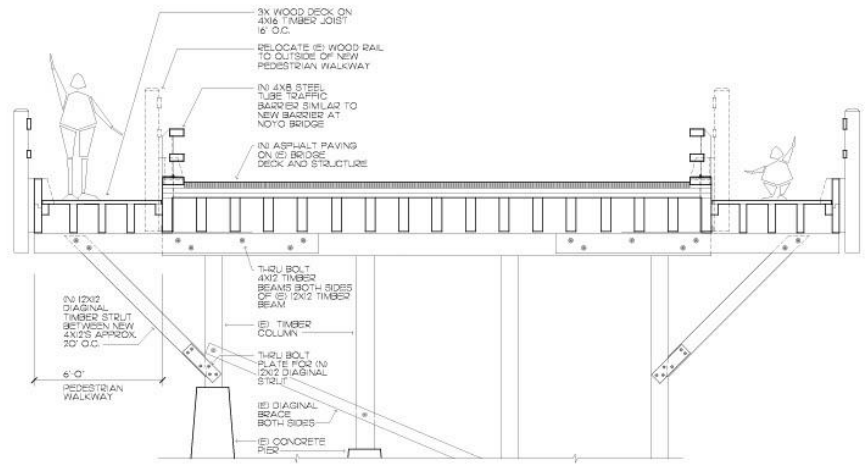
A major historic element of the Albion River Bridge will be preserved when the existing rail assembly is relocated to the outside edge of each walkway. The remaining reconditioned roadway will then be defined by the most recent Caltrans standard metal barriers along each side.

As a working architect, and 25 year resident of Albion, I have been able to develop a special appreciation for the tremendous effort that was made by Mendocino County residents to create this historic treasure.

And now, it's up to us to **Save the Albion River Bridge.**

John Johansen, Albion

I have attached a copy of a preliminary drawing I prepared 10 years ago to facilitate this design.



REVISED CROSSECTION THRU BRIDGE AT NORTH END LOOKING SOUTH (1)

SCALE: 1" = 16' (3/4" = 12')

GRAPHIC SCALE 0' 4' 8' 16'

jrja

Albion River Bridge
Highway 1, Albion, California

P.2

Caltrans
Attention: Liza Walker
Office of Environmental Management
1656 Union Street
Eureka, CA 95501

Subject: Public Comment on Energy Efficiency and Preservation of the Historic Albion River Bridge

Dear Ms. Walker:

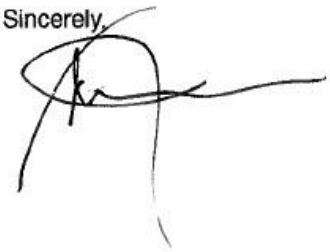
5

I am submitting my comments on the energy efficiency aspects of the Albion River Bridge Replacement Project alternatives. The Energy Analysis Memorandum discusses the significant energy consumption required for constructing a new concrete bridge (Energy Analysis Memorandum, p. 3-5). The Project alternatives (the DEIR/DEIS erroneously presents no proposed project for relevant specific analysis) also do no describe and analyze the extent to which they may increase Vehicle Miles Traveled, either during the 4-6 year total construction/bridge removal phase or during the proposed 75-year service life of a new bridge, notwithstanding that the DEIR/DEIS . projects a substantial increase in average daily trips (ADT's) on the bridge.

Instead of pursuing an energy-intensive new construction project, I urge the project team to rehabilitate and preserve the existing historic Albion River Bridge. Rehabilitation requires less energy and fewer resources, making it a more sustainable and cost-effective solution. This approach aligns with California's goals of reducing energy consumption, greenhouse gas emissions, and vehicle miles traveled, while preserving an invaluable piece of California history.

Please consider this alternative as a more energy-efficient and environmentally friendly option.

Sincerely,



In Defense of her Rail

Did you ever wake-up in Albion, just before dawn
and watch the sun rise thru the valley,
gradually igniting the snow-white guardrail
of the Albion River Bridge?
For 74 years, this line of sentries, 150 strong,
Has stood guard on both sides of this
Precious 1 thousand feet of Highway 1.
The cadre stand exactly 76 inches on center
And align perfectly with the major elements
Of the timber structure below.
As you pass over this bridge,
The simple tempo of the rail's march
Gives only a slight indication of the
Magnificent structural engineering symphony
That supports the bridge from the valley below.

I've been waking up before dawn every day in
Albion for ~~20~~ 15 years.
And I've experienced the bridge rail light show
Hundreds of times. It never gets old.
I'm always reminded of the lines from
the classic folk ballad: *Across the Great Divide:*

> The finest hour that I have seen
> Is the one that comes between the edge of night
> And the break of day,
> When the darkness rolls away.

I can't speak for her but,
I think Kate Wolf would have wanted to save
The Albion River Bridge.

John R. Johansen, Albion

The Albion River Bridge: A Short History

On July 31, 2017 the Albion River Bridge was placed in the National Register of Historic Places and as a result this property has also been listed in the California Register of Historical Resources.

The original bridge over the Albion River was a low timber drawbridge. It served as an important element of the "Old Coast Wagon Road" established by Mendocino County along this section of the northern California coastline. During the late nineteenth century, most traffic to and from coastal towns and sawmills was by steamship or from inland rail connections. The drawbridge location routed the minimal coastal traffic through the center of the sawmill operations of the Albion Lumber Company, the first mill to be built on the Northern California coast (1852). It was built by William A. Richardson, the first American to settle in California (1823).

As the amount of wagon and ultimately motorized traffic increased along the coast beyond the capacity of the small drawbridge, a new route was established. An elevated timber trestle bridge was designed and built by Mendocino County in 1922. It was located one half mile up river thus avoiding the disruption caused by the increased traffic in the center of the mill operations. This new location also soon became inadequate to accommodate the ever increasing commercial and industrial traffic along Highway 1.

The meandering access roadways to the old bridge and its narrow roadbed required that the Highway Department consider complete replacement rather than major structural alterations. Since all lumber company operations had ceased by 1934, the former mill location was abandoned. A new route, directly across the valley, at the mouth of the river, was established and a new design was prepared in accord with Department of Highways' continuing commitment to the dictates of the "City Beautiful" movement of the early 20th century.

This movement, promoted by Charles Mulford Robinson emphasized that "*a bridge is so conspicuous and monumental a structure that we should not be satisfied merely with durability and strength, but should demand that these be added: fitness, grace, and beauty.*" In accord with this movement, the Division of Highways eliminated truss designs for all but exceptionally long span bridges. This commitment to more beautiful designs included a program of new and replacement bridges along California's scenic coastal Highway 1. Timber and steel truss bridge design was set aside and replaced by steel reinforced, poured in place, concrete beams and arches. Concrete was much more readily available in California and the decreased maintenance cost was an attractive consideration, especially along the coast. A premiere example of this effort is the National Register listed Bixby Creek Bridge (1932) at Big Sur, in Monterey County.

In Mendocino County, two beautiful concrete arch bridges were built to replace the deteriorated timber trestle bridges at Jug Handle Creek (1938) and Russian Gulch (1940). These bridges are less than 10 miles north of Albion on Highway 1. When the war began, in 1941, the new bridge for Albion was still on the drawing board, and all new bridge work was restricted to "major" California roads. Highway 1 at Albion did not qualify.

However, after major lobbying efforts by coastal businesses, governments, and residents, the design work was finally authorized to replace the dangerous, deteriorating timber deck over timber truss bridge at Albion, and eliminating its one mile of dangerous, meandering access roadways.

Initially, two giant concrete arches were designed to span the 1,000-foot–wide valley at the mouth of the river. However, the amount of concrete and steel required for this design was not considered appropriate by the newly established War Production Board (WPB) and

could not be approved. **The bridge had to be redesigned.** The Division of Highways design engineers accommodated the severe restrictions imposed by the WPB, and the final revised design was approved in 1942 by C.H. Purcell, Director of the California Department of Public Works.

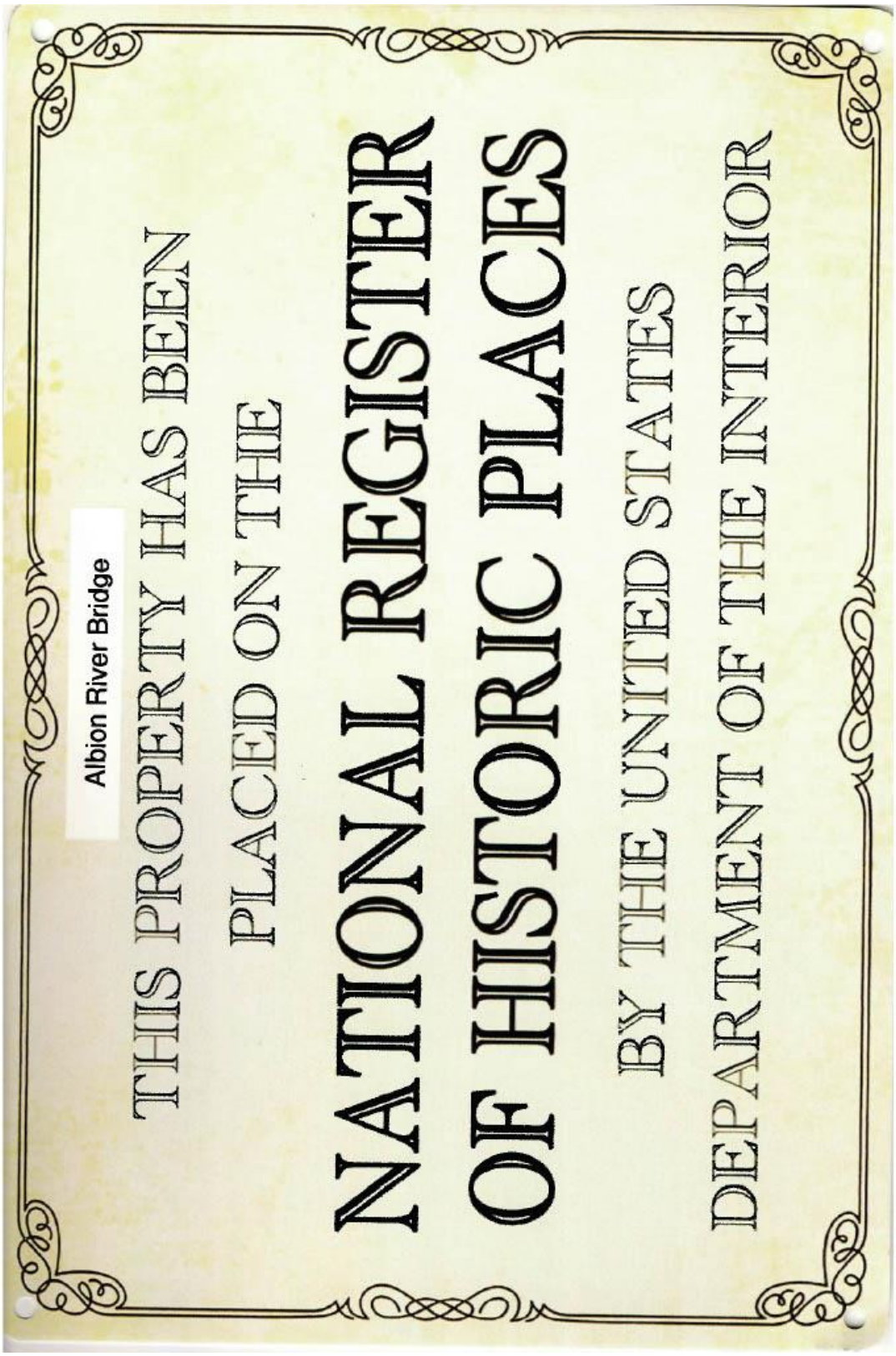
The amount of concrete was limited to foundations, abutments, and only two of the thirteen vertical towers, called bent piers. A steel truss was salvaged from an abandoned Swayne Lumber Company railroad bridge over the south fork of the Feather River near Oroville, 120 miles east of Albion. It was shipped to the Schrader Iron Works of San Francisco and refabricated into a 15-foot–deep Pratt truss.

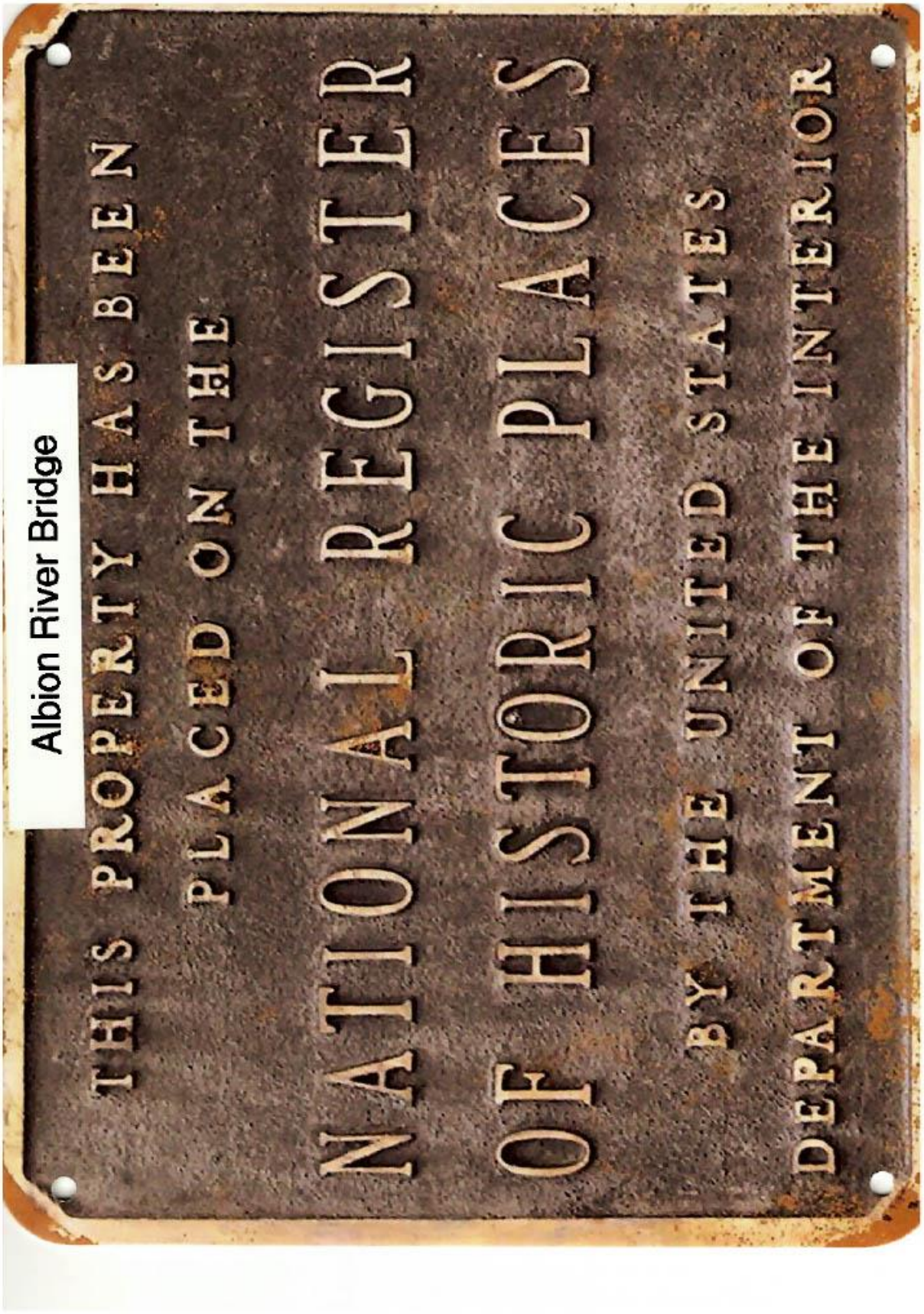
This truss was installed onto 135-foot, poured-in-place concrete piers located on each side of the 130-foot–wide river crossing section of the bridge. The remaining trusses are treated timber supported on treated timber trestle-type bent piers of various heights on concrete foundations. Salvaged railroad rails were split and used to reinforce the new concrete elements of the bridge, in lieu of standard reinforcing steel.

Redwood, then restricted, was not available for the timber elements of the structure. Consequently, the revised design substituted a relatively new product: pressure treated Douglas Fir produced by the Wauna Lumber Company in Wauna, Oregon. They shipped 829,000 board feet of treated timber to Albion. This wood preservation process, along with an excellent maintenance program, are considered to be the major contributing factors in extending the life of this bridge beyond its estimated 20 years by more than 50 additional years—so far. According to Caltrans' most recent inspection report (2014), the bridge is still in excellent condition.

Construction began in 1943. The bridge was built by the Fred J. Maurer and Son Construction Company of Eureka, California, at a cost of $370,000.00. The resident engineer was T.H. Horn. The Albion River Bridge was dedicated on June 11, 1944.

The short history of the Albion River Bridge was part of the narrative on the application submitted for listing the **Albion River Bridge** on the Department of the Interior's **National Register of Historic Places**, by John Roger Johansen, Architect, Albion, California.


Albion River Bridge
THIS PROPERTY HAS BEEN
PLACED ON THE
NATIONAL REGISTER
OF HISTORIC PLACES
BY THE UNITED STATES
DEPARTMENT OF THE INTERIOR


Albion River Bridge
THIS PROPERTY HAS BEEN
PLACED ON THE
NATIONAL REGISTER
OF HISTORIC PLACES
BY THE UNITED STATES
DEPARTMENT OF THE INTERIOR

Response to John Johansen

1. We note your preference for rehabilitation of the bridge.
2. Cost is just one consideration in Caltrans projects. For the Albion River Bridge Project, rehabilitation of the bridge does not meet most of the basic project objectives.

   In regard to cost, rehabilitation would not reduce ongoing maintenance costs, as bridge components of the rehabilitation options would have shorter lifespans compared to a new bridge, requiring an extensive ongoing maintenance program. The maintenance program would include periodic replacement of timber and connection hardware (e.g., shear rings and bolts), resurfacing of the bridge deck, and painting of the bridge's steel truss and rails.

   Further, rehabilitation does not maximize public investment at this location as rehabilitation alternatives would need major maintenance or replacement in as few as 10 years, compared to the 75-year lifespan of a replacement bridge, due to the shorter lifespan of bridge components.

   Additionally, there is much uncertainty in rehabilitation projects as the extent of damage to certain bridge components due to the inaccessibility of certain bridge components. This uncertainty would have the potential to substantially increase the construction duration and associated traffic delays for the rehabilitation alternatives, increasing impacts to the traveling public and community.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).
3. The addition of a walkway to the existing bridge to provide pedestrian access is not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. However, a Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.
4. The bridge is bordered on each side by two 4-inch-wide wooden bridge rails atop the bridge deck. The bridge rails are not capable of resisting current safety impact loading requirements and need to be replaced. Caltrans requires compliance with current bridge rail design standards when a structure is rehabilitated or replaced.

There is no standard bridge rail available that could connect to the existing bridge's timber deck without exceeding the design load of the bridge deck. Failure to address the need for a standard bridge rail that meets current safety impact loading requirements is one of the many project objectives that the rehabilitation options fail to satisfy.

5. The proposed project would not result in an inefficient, wasteful, or unnecessary consumption of energy. In addition, the project would not increase vehicle miles traveled. See Master Response 11 (Energy) for details on energy use during construction and Master Response 12 (Vehicle Miles Traveled) regarding VMT. See also Master Response 2 (Construction Duration) for the project schedule, and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation. In regard to evaluation of "no proposed project", the No-Build (No-Action) Alternative is required to be evaluated under NEPA and CEQA.

5.48 JOSEFINA PERLA

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Josefina Perla E-mail/Phone# _____

Address (home) 3335 King Salmon City Albion State Ca Zip Code 95410

Authorized Representative (name of organization or agency) _____

Address (business) City State Zip Code

1

COMMENTS First of all, there is no good reason to replace the Albion River Bridge which has not been properly maintained by Cal-Trans for years & has been purposely neglected. Cal Trans must finish the seismic retrofit, repair any damage & perform delayed maintainance to honor this Historic structure.

2

The proposed contractor, Granite Construction, has been fined millions of dollars in the last 20 years for accounting, environmental, government contracting & safety violations.

3

This is a historic bridge on a Wild & Scenic river & must be maintained & preserved. Replacing this bridge invokes many environmental hazards to endangered wildlife & the surrounding eco systems. This area's local & tourist economy is built on the preservation of our local history & Natural habitats including a heron rookery, wild salmon access to breeding grounds, fragile bluffs on the river sides & the Nationally registered Historic Resource that is the Albion River Bridge - the last remaining timber trestle highway bridge on the California coast.

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Josefina Perla

1. The environmental document (ED) extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards).

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. Comment noted.

3. A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including mitigations for impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. Additionally, standard measures **BR-2** and **BR-4** would be implemented. **BR-2** includes limiting vegetation removal to the period outside the bird breeding season and, if vegetation removal is required during the breeding season, conducting pre-construction nesting bird surveys and implementing a Bird Exclusion Plan if needed. **BR-4** includes revegetating temporarily disturbed areas.

5.49 JULIE RUMBLE

From: jrumble@mcn.org
To: albionbridge@DOT; acab@mcn.org
Subject: Albion Bridge
Date: Sunday, September 8, 2024 8:10:32 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1 I'm writing to urge you to reconsider the project proposal to rebuild the Albion River Bridge.

2 The construction of a "replacement" bridge on the Albion River will impact residents of the Mendocino coastal community for years to come, in myriad ways. Construction time estimates of three to five years (some estimates being as long as nine years) will disrupt the daily lives of locals, with special burdens borne by those in our 'service' economy.

3 The bridge is, in fact, the lifeline for each of us to accomplish our day-be it the bus to school, the kids' performance at school, the road to work, the route to buy groceries, the highway to the hospital or medical appointments, a restaurant, a concert, the bigger river-the Big River estuary, or just down to the Albion River to paddle and see if the otters have a new brood, the road back home...

4 The typical day will be forever altered, with the proposed construction scenario- partial to full closure hours on Highway 1-with a 28 mile detour via rugged back roads when closures happen.

5 Most importantly, building the new bridge with its accompanying years of disruption and damage is not necessary. Why?
The current Albion River Bridge is deemed "SAFE", and at 85 years old considered in remarkably good shape. In fact, in 2018, two professional engineers, Dick Schmidt, Ph.D and Ben Brungraber, Ph.D, found the bridge "safe for continued use" and "in remarkably good condition". In addition, even Cal Trans has found that the bridge would likely survive even a "1000-year tsunami".

6 Ongoing maintenance and rehabilitation of the old historic bridge is economically prudent. Why?
The cost of annual maintenance has averaged about $250,000 since its construction. That ongoing cost pales compared to 2024's $155 million estimate for new construction. The building project in addition would also require expensive environmental remediation.

7 Rehabilitation and maintenance of the old historic bridge best serves our community. This alternative prevents environmental degradation and maintains consistency with the Coastal Act.

Knowing that the new bridge is not necessary, let's take "the high road" and work together to employ rehabilitation and a consistent practice of maintenance.

Please choose a path of least harm and consider the needs of the coastal community.

Thank you for your consideration.

Sincerely,

Julie Rumble
PO Box 2
Albion, CA

Response to Julie Rumble

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document (ED) Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).
2. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).
3. The ED acknowledges that a safe and reliable bridge over the Albion River is vital to the north and south sides of the community of Albion for residents, regional users of State Route 1, and tourists on the Mendocino Coast. The purpose of the proposed project is to provide a safe and reliable structure; the new bridge would have an anticipated service life of 75 years.
4. The proposed project would not have significant or permanent traffic impacts. Construction and associated traffic impacts would be temporary, and the project would implement minimization measures to reduce traffic impacts.

   The project proposes one extended 10-hour closure, which would be overnight to cause the least disruption to the public. This closure would precede the traffic switch from the existing bridge to the replacement bridge. Traffic would have the option of using state routes to detour around the closure or may elect to use other routes to cross the Albion River, which are not on the state highway system, at their discretion.

   Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).
5. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

6. Your comment does not to acknowledge the initial and ongoing costs associated with bridge rehabilitation, including extensive recurring maintenance and structural improvement projects that are anticipated to increase over time.

   Neither rehabilitation option would achieve the same engineering performance as a replacement bridge. Both rehabilitation options would require an extensive ongoing maintenance program, which would include periodic replacement of timber and connection hardware (e.g., shear rings and bolts), resurfacing of the bridge deck, and painting of the bridge. There is much uncertainty in rehabilitation projects as the extent of damage to certain bridge components may not be fully known until they are actually replaced. This uncertainty would have the potential to substantially increase the construction duration and associated traffic delays for the rehabilitation alternatives, increasing impacts to the traveling public.

   To maximize the public investment in a new Albion River crossing, a new bridge would be designed with a 75-year life expectancy before major maintenance or rehabilitation is needed. Minimizing ongoing maintenance costs is one of the many project objectives that rehabilitation options fail to satisfy. However, components of the rehabilitation alternatives would need major maintenance or replacement in as few as 10 years.

7. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6 and Appendix I. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.50 KAREN CHAMBERS

From: Karen Chambers
To: albionbridge@DOT
Subject: Albion Bridge
Date: Friday, August 16, 2024 3:49:07 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

My vote is to restore the existing bridge.

Karen Chambers

Response to Karen Chambers

1. We note your primary preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.51 KAT MONTEIRO

From: Kat Monteiro
To: albionbridge@DOT
Subject: Comment
Date: Monday, October 7, 2024 4:00:13 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I believe this project is way over kill. Albion does not need a 47 ' wide concrete bridge. Maybe cut it down to one pedestrian walkway on one side and the bikes can share that space then you won't need the same shoulder on both sides and it will cut down the width.
I am very concerned how this is going to affect our property and view
And what about the speed that cars drive by now! Can you imagine how it will be with a wide bridge. I hope they post and enforce a low speed limit.
Just my 2 cents.

Kat Monteiro

Response to Kat Monteiro

1. The Albion River Bridge is functionally obsolete because it does not meet minimum design standards due to the narrow deck geometry. This deficiency was one of many functional, safety, and structural deficiencies identified in the environmental document as the project need (see Section 1.4.2, *Need*). The replacement bridge deck for all Build Alternatives would be 47 feet wide with 12-foot-wide travel lanes, 6-foot-wide shoulders, and a 6-foot-wide separated pedestrian walkway. All Build Alternatives would also widen the roadway shoulders on State Route 1 to 4 feet within the post mile limits consistent with the Mendocino County Coastal Element, which would transition to 6 feet wide on the bridge approaches.

   The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

5.52 KATHY WYLIE

From: Kathy
To: albionbridge@DOT
Subject: Public Comment on Community Impact and Preservation of the Historic Albion River Bridge
Date: Friday, September 6, 2024 6:50:43 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1

I am writing to address the community impact of the Albion River Bridge Replacement Project. I fully support replacement of this bridge. It is un-safe.

I urge the project team to consider expediting this project to the fullest extent possible. I do not support the small minority of armchair engineers, engaged in a very small and vocal community group that is bleating for rehabilitation.

Please prioritize the construction of a NEW Albion River bridge.

Sincerely,

Kathy Wylie
Albion resident since 1995

Response to Kathy Wylie

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.53 KIM OBERMEYER

From: Kim Obermeyer
To: albionbridge@DOT
Subject: Public Comment on Biological Resource Disruption and Preservation of the Historic Albion River Bridge
Date: Sunday, September 8, 2024 4:58:44 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1

I am a local biologist and consultant with 30 years of experience. I also live on the north edge within the Albion River watershed. I am writing to share my opinion that the proposed construction of a new bridge will have significant impacts to biological resources, including the sensitive eelgrass habitats, salmon and steelhead, and dungeness crabs as a result of the Albion River Bridge Replacement Project. The Albion flats on the seaward side of the bridge area are an occasional marine mammal haulout area including the sensitive northern fur-seal which was observed here in 2013. Eelgrass beds play a critical role in the coastal ecosystem, providing habitat for various marine species and contributing to water quality. The construction of a new bridge could significantly disturb these habitats, marine mammal use and other biological resources in the area (Draft Final Hydraulic Report, p. 3-4).

2

To protect these vital resources, I recommend that the project team pursue the rehabilitation and preservation of the existing historic Albion River Bridge. Rehabilitation will have a much lower impact on the surrounding environment, including the eelgrass beds, by avoiding the extensive in-water work required for a new structure. Preserving the existing bridge also aligns with environmental stewardship and the protection of Mendocino County's unique coastal ecosystems.

Thank you for considering this environmentally conscious alternative.

Sincerely,

Kim Obermeyer, MS

--
***
Kim Obermeyer, Biologist, MS
https://www.northcoastbiology.com/
41460 Sundew Lane, Little River 95456
Tel. 541-621-9529
E-mail: kobermeyer@gmail.com

Response to Kim Obermeyer

1. A comprehensive environmental analysis for the proposed project was completed. The environmental document identifies measures to avoid, minimize, and/or mitigate environmental impacts, including mitigation for impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments, and Section 3.4, *Biological Environment,* for more information on biological resources in the project area.

   Impacts to eelgrass were assessed for the Build Alternatives. Under the identified preferred alternative (Design Option 2B – East Arch), no permanent impacts to eelgrass are anticipated. Further, removal of the majority of the piers from the existing bridge would increase available habitat and may improve the estuary function by creating more natural hydrological conditions.

2. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.54 KRISTA EIBER

From: Krista Eiber
To: albionbridge@DOT
Subject: New Bridge
Date: Tuesday, October 8, 2024 10:51:29 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Thank you for all the time and resources you have put into the idea to save the old bridge, I too have sentimental feelings towards the bridge, however I think public safety is far more important. As a young girl I went on the catwalk and felt the shaking when a logging truck went by, I can only imagine what it would feel like now… We need a new bridge. I would like public access to be a consideration moving forward. I also think either of the plans with the arch would really add to the beauty of the bay I have called for over 40 years.

Thank you, Krista Eiber.

Response to Krista Eiber

1. We note your support for bridge replacement with an arch design to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

   A Public Access Feasibility Report was prepared for the project consistent with California Streets and Highways Code Section 84.5. The report gave consideration to additional public access at the north and south ends of the bridge within the existing and proposed state right-of-way and determined it was impractical due to impacts on adjacent private property, sensitive habitats, and lack of practical design options that would comply with the Americans with Disabilities Act access requirements.

   However, the proposed project would provide a structure with improved bridge approaches and a 75-year service life, which would ensure safe and reliable coastal access near the Albion River. Further, the project proposes to improve Albion River North Side Road, which connects SR 1 to the Albion Campground, by widening and realigning the road. For additional details regarding public access, see Master Response 4 (New Public Access).

5.55 L.A. HYDER

From: L.A. Hyder
To: albionbridge@DOT
Cc: Annemarie
Subject: The Beautiful & Exceptional Albion River Bridge
Date: Wednesday, September 25, 2024 12:13:24 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Walker,

1

I don't need to send you a template letter...just my protest against this bridge being touched other than finishing the seismic retrofit, adding cantilevered access for pedestrians and bicycles, and enhancing the road deck drainage.
This is a beautiful bridge - the last of its kind in California and it needs to remain. And to NOT BECOME A LARGE UGLY CONCRETE THING.

Also, a new (or supplemental) (DEIR/DEIS) and Draft Section 4(f) evaluation MUST BE produced for public review and comment. To have so much opposition to this project and be blind to its shortcomings is nothing less than tragic - plus, we don't need faster cars on this beautiful area of HWY 1.

Thank you,
L.A. Hyder
resident, Mendocino
707 962 7695

Response to L.A. Hyder

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The addition of a walkway to the existing bridge to provide pedestrian access is not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. Failure to address the need for a standard bridge rail that meets current safety impact loading requirements is one of the many project objectives that the rehabilitation options fail to satisfy.

   A Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

   The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.

5.56 LAUREN KNAPP

From: Lauren Knapp
To: albionbridge@DOT
Cc: Josh Gmail
Subject: Albion Bridge Project
Date: Tuesday, October 8, 2024 4:56:10 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

To whom it may concern,

1

Our comment has to do with the rerouting of the road to the campground, not the replacement of the bridge itself. Our original understanding, and still the only plan we have seen, had the road rerouted to a place east of the housing development on Albion Little River Road. Someone recently brought to our attention that the plan has changed, and the current plan is to go through the development, taking out an existing house. We can't find that plan anywhere, but if that is the case, we are strongly opposed to the placement of that road.

The small neighborhood has historic houses and kids who run around on the dirt drive. That placement would not only be a nuisance, but it would be dangerous. The neighborhood cannot be host to a string of RVs going up and down every weekend, not to mention the drunk drivers that come up and down regularly. It would destroy the peace and quiet and take out a home thats over 100 years old. There is simply no reason that the road would necessitate the destruction of a house and neighborhood, when there are so many options east of the stand of houses.

If this is not part of the plan, please disregard, but if it is, please consider alternatives that would be less destructive to this historic neighborhood. And please keep me and the other homeowners apprised of the changes to the plan.

Thank you,

Lauren

Response to Lauren Knapp

1. As a component of the proposed project, Albion River North Side Road would be realigned to join Albion Little River Road east of State Route 1. The realigned road would not involve removal of a home. See Figure 10 in Section 2.2.3, *Alternative 2: East Alignment*.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.57 LAWRENCE TURNER

From: Lawrence Turner
To: albionbridge@DOT
Subject: Public Comment on Bridge Replacement
Date: Wednesday, September 11, 2024 11:09:38 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

I am writing to comment on the replacement of the Albion Bridge.

1 Please take the safety of the entire community into consideration - while I find the bridge attractive, I value the safety of my family more - I would fully support replacement of this bridge.

Sincerely,

Lawrence Turner
415-465-3739 | lawrenceeturner@yahoo.com

Response to Lawrence Turner

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.58 LEONA WALDEN

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Leona Walden E-mail/Phone# 707-937-0900

Address (home) 31401 Middle Ridge Rd City Albion State CA Zip Code 95410

Authorized Representative (name of organization or agency) none

Address (business) — City — State — Zip Code —

To Cal Trans,

1

The meetings Cal Trans has hosted over the past many years has made it amply clear that the Albion River Bridge needs to be replaced. Repairs are no longer adequate.

The excellent meetings on August 13 and via zoom in September made it very clear that the Albion Bridge has reached the end of it's usful years.

We have been attending meetings since 2014 and have watched the "Bridgers" monopolize the meetings with their impassioned pleas to "Save the Historic Albion Bridge". I am sympathetic for those who wish to preserve historic structures (as I do) and, even more, those who live in the Albion Village where 3 years of bridge work will be very impactful.

I am grateful that Cal Trans has persisted as I believe there may be dramatic climate change that only a new bridge will withstand.

2

Please consider ways in which the state can compensate those who will have to withstand the brunt of the bridge work including loss of income from rentals, especially vacation rentals.

Sincerely, Leona Walden lwalden@mcn.org

Albion resident since 1972,

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Leona Walden

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

2. The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

5.59 LISA WEG

From: LISA WEG
To: albionbridge@DOT
Cc: acab@mcn.org
Subject: Public Comment on Community Impact and Preservation of the Historic Albion River Bridge
Date: Sunday, September 8, 2024 12:33:04 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Walker,

1 I'm writing to express my strong concerns about the impacts that the Albion River Bridge Replacement Project will cause. Constructing a new bridge could lead to significant habitat loss, soil erosion, and water pollution, all of which would have lasting impacts on the local environment. Furthermore, the bridge is of significant historic value to our coastal community, "iconic" to quote your CIA.

2 Newer and bigger isn't always synonymous with better. As a 30 year resident of the coast, I'm disturbed that CalTrans has focused its resources on a full replacement, while ignoring the preservation alternatives. The Albion Bridge is a treasure for both residents and visitors, and we should be doing everything possible to protect our coastal resources, both biological and cultural.

Rehabilitating and preserving the existing bridge would greatly reduce the environmental footprint of the project. Rehabilitation requires fewer resources and less invasive construction methods, which would help protect the natural landscape and the species that depend on it. Rehabilitation aligns with the protection of Mendocino County's unique coastal ecosystems, and would honor the bridge's historical and cultural significance.

I urge the project team to prioritize the rehabilitation of the existing bridge as a more historically and environmentally respectful alternative.

Lisa Weg
Caspar Resident

Response to Lisa Weg

1. A comprehensive environmental analysis was completed for the proposed project. The environmental document (ED) identifies measures to avoid, minimize, and/or mitigate environmental impacts, including for impacts to biological resources. Further, mitigation measures were identified for potentially significant impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. With implementation of mitigation, impacts to biological resources would be reduced to a less than significant level under CEQA. See Master Response 13 (Environment) for more information on effects to environmental resources.

   Standard measures and Best Management Practices are included as part of the project. During construction, the proposed project would implement a site-specific Stormwater Pollution Prevention Plan, which would include construction site BMPs to control sedimentation, erosion, and potential chemical pollutants.

2. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.60 LIZ HELENCHILD

From: Liz Helenchild
To: albionbridge@DOT
Subject: Public Comment on Traffic Disruption and Preservation of the Historic Albion River Bridge
Date: Saturday, September 7, 2024 5:31:50 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1

As a 50+ year resident of Mendocino Town, I am writing to express my intense concerns about the likely significant traffic disruption caused by the Albion River Bridge Replacement Project's "build alternatives" and removal of the historic, iconic Albion River Bridge. The construction of a new bridge would likely result in significant one-lane and full bridge traffic delays and detours, negatively impacting local residents, businesses, and visitors who rely on State Route 1 for daily travel to work, school, shopping, recreation, public & faith community meetings, among other destinations (Initial Site Assessment, p. 2-4).

I am especially concerned about the foreseeable slowing of emergency vehicles, especially in fire events. There are no feasible detours around the Project. Most volunteer firefighters & EMTs must travel from their relatively remote homes on short notice, then congregate at widely scattered firehouse locations & equipment staging areas. Jack Peters Creek north of Mendocino Town will continue to be a bottleneck. Projections of speedy clearing of both of these choke points are not realistically addressed in the DEIS/DEIR.

Nor are the impacts (slowdown, congestion, noise, wear & tear, etc) of greatly increased travel to & from Albion on winding, mostly 2-lane Hwy One by vehicles involved in the project.

Several days a month, I host shows from the KZYX studio in Ft Bragg. KZYX is a local public radio station providing & updating crucial information in emergencies throughout & beyond Mendocino County. The programmer currently on air is responsible for broadcasting that information. I am only one of many broadcasters who will need quickest possible access to this studio. I am concerned about increased travel time for those of us south of Ft Bragg.

2

To minimize these unmitigated significant community impacts, also impacts foreseeable & not yet imagined, I strongly recommend rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge structure at a cost of over $130 million to over $155 million. Rehabilitation could be done in phases, allowing for continuous traffic flow with fewer disruptions. This approach would reduce the negative effects on the community, coastal businesses, prevent lengthy detours, and preserve the vital connection that the current bridge provides for this part of coastal Mendocino County.

3

Preserving the existing bridge also respects its historical significance, offering a solution that balances both functional needs and cultural heritage.

Thank you for considering this more community-friendly alternative.

Sincerely,

Response to Liz Helenchild

1. After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B is anticipated to take three years to construct.

   Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).

   The project proposes one extended 10-hour closure, which would be overnight to cause the least disruption to the public. This closure would precede the traffic switch from the existing bridge to the replacement bridge. Traffic would have the option of using state routes to detour around the closure or may elect to use other routes to cross the Albion River, which are not on the state highway system, at their discretion.

   Emergency response agencies would be notified of the proposed project construction period and would have access to State Route 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicle across the bridge at all times (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes. For additional detail regarding emergency services, see Master Responses 7 (Traffic and Emergency Response).

2. Impacts to public services and transportation were fully analyzed in the ED and were determined to be less-than-significant under CEQA; therefore, no mitigation is required.

3. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I*, Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.61 LOUIS SCIOCCHETTI AND REBECCA MCLEAN

To: Liz Walker
CalTrans North Region Environmental
1656 Union St., Eureka, CA 95501

From: Louis Sciocchetti & Rebecca McLean
19500 Noyo Acres Drive, Ft. Bragg, CA 95437

Re: State Route One Albion River Bridge Replacement Draft Environmental Impact Report (DEIR)

1

We have resided on the Mendocino Coast since 1988. We regularly utilize State Route One for travel to Sonoma County for travel to Anderson Valley, for access to the Sonoma County Airport & for medical issues that require the use of Sonoma County Sutter Health Medical Facilities.

The historical record provides that construction of the existing Albion River Bridge was a civil project, conducted during World War II (WWII), that utilized a salvaged scrap-metal bridge truss & milled Douglas-fir timbers for primary materials. If not for the concrete & steel constraints of the war effort, the bridge would likely have been a curved-arch concrete span similar to the Route One Russian Gulch & Jughandle Creek bridges. The WWII project was never intended to be a "permanent" bridge by any of the highway construction standards present during that era. It was intended to address the existing sub-standard & dangerous highway approaches & low bridge crossing that served as the only public access vehicle route across the river at that time. The use of wood timbers also allowed the Union Lumber Company in Ft. Bragg to provide the necessary lumber.

At of this late date of 2024, the existing Albion River Bridge is functionally obsolete from every possible non-engineer viewpoint with regard to basic safety & efficiency standards. The roadway is too narrow to accommodate over-sized equipment, no safe bicycle or any pedestrian access, and a dangerous near-50 degree highway turn on the north end. The engineering evaluations that we have seen support this view. According to CalTrans' own analysis (not the Internet Wikipedia puffery) the existing timbers are NOT in good shape. They exhibit decay consistent with their age & exposure to the ocean wind, salt & water elements that exist in this

location. In 2002, local resident Albert Dompling was nearly killed when his log truck crashed through the wooden railing (he avoided a head-on with a local idiot who was passing cars across the double yellow line) and ended up on the south bank below the bridge. A modern reinforced steel & concrete railing system could have prevent this accident.

The existing bridge is a modified "trestle" design, commonly used during the late 20th century to accommodate railroad crossings & also highway crossings along the Mendocino Coast & elsewhere during that era. The present Route One Salmon Creek bridge replaced a high wooden-trestle design located a short distance upstream, Trestle bridges have virtually no earthquake resistance. The historical photo & diary record supports the fact that all of the high railroad trestles on the coast collapsed during the 1906 earthquake. High trestle structures were never designed to resist any significant lateral movement. As wood & labor were cheap during that era, it was a simple matter to just rebuild.

The existing Albion River Bridge was induced into the National Register of Historic Places and the California Register of Historic Resources in 2017 by the "Albionite" activists that cling to the fantasy of a decaying wood & rusting steel "temporary" structure continuing to support a primary Mendocino Coast arterial route. As the historical recordation is now complete, the replacement process for a modern structure can begin so that the user base can move into the 21st century & beyond. Instead of sending the old wooden timbers to a landfill, we suggest that they be provided to our own Albionite "Wooden Bridge" supporters for use in constructing their own pedestrian trestle across the river down on flats.

We support the CalTrans effort to replace the existing State Route One Albion River historical artifact with a modern, functionally efficient, & safe concrete arch structure. If "Design 1B" is the chosen structure, then appearance of the new bridge will be consistent with other Mendocino Coast concrete bridges WITH a wider deck & safe pedestrian access.

Thank You
Louis Sciocchetti
Rebecca McLean

Response to Louis Sciocchetti and Rebecca McLean

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B was found to be the environmentally superior alternative and is similar to Design Option 1B (West Arch) in that it involves a spandrel arch that will for allow expansive views beyond the bridge.

5.62 MARCUS MCCALLEN

From: Marcus M. McCallen III
To: albionbridge@DOT
Subject: AGAINST BUILDING A NEW ALBION BRIDGE
Date: Monday, September 9, 2024 2:19:43 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Dear Cal-Trans - I live at the Woods in Little River, and I am vehemently AGAINST building a new Albion Bridge.

For starters, The Woods is the number one user of our LITTLE RIVER-ALBION VOLUNTEER FIRE DEPARTMENT. If this construction goes as CALTRANS proposes, it will ADVERSELY effect our Volunteer Fire Department.

1) It will cut the equipment resources access by half - leaving half of our equipment on each side of the construction site.

2) It will compromise the amount of time our volunteers can reach EMERGENCIES. (Medical and FIRE).

Thousands of partial and full closure hours of Highway 1, with a 126-mile detour via Highway 101 (or by poorly maintained, low-capacity county roads, 28 miles)

Please do NOT go forward with this project. It will severely and negatively affect residents here.

Thank you very much.

- Marcus McCallen

Response to Marcus McCallen

1. We note your opposition to the proposed project.

   Emergency response agencies would be notified of the proposed project construction period and would have access to State Route 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicle across the bridge at all times (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes. For additional detail regarding emergency services, see Master Response 7 (Traffic and Emergency Response).

   The project proposes one extended 10-hour closure, which would be overnight to cause the least disruption to the public. This closure would precede the traffic switch from the existing bridge to the replacement bridge. As stated above, emergency services would be accommodated across the bridge at all times, including during the closure.

5.63 MARK EDWARDS

From: Mark Edwards
To: albionbridge@DOT
Subject: Albion Bridge Replacement Project
Date: Monday, September 23, 2024 5:51:26 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Caltrans,

1

Regarding the design alternatives, I favor the arched design. I have no preference of alignment - I recommend that you select the most cost effective and timely alternative.

I will be sad to see the old bridge go away as it is a remarkable structure to look at. I usually camp on the Albion Flats below the bridge for three weeks annually and I have spent many hours looking at it and wondering about the proposed replacement. I am sure many of the locals will be sad to see it go, as will I.

2

I understand that the Albion Flats Campground may be shut down for several years during construction - please try to minimize the period of time during which the campground will be impacted.

Thanks for taking my comments.

Sincerely, Mark D Edwards

Mark Edwards
1201 1st Ave.
Walnut Grove, Ca 95690

Sent from my iPad

Response to Mark Edwards

1. We note your support for bridge replacement with an arch design to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

2. The proposed project would not permanently block public access to the Albion Campground and, pending right of way negotiations, certain Albion Campground facilities may remain open to visitors (at the owner's discretion). Visitors would use the existing vehicle access from Albion River North Side Road, subject to the traffic control described in Section 2.2.5, *Common Design Features of the Build Alternatives,* or by watercraft through the existing outlet. The Albion River outlet would also remain open during construction, except when intermittent passage closures are necessary to facilitate bridge construction or bridge demolition. For additional detail regarding public access, see Master Response 5 (Public Access During Construction).

5.64 MATT GOUIG

From: Matthew Alan Gouig
To: albionbridge@DOT
Subject: The Albion Bridge
Date: Wednesday, September 4, 2024 5:08:01 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

KEEP THIS BRIDGE! It can be maintained and yet still retain it's beauty and historical significance. The destruction and work involved will destroy local businesses and harm everything we hold dear. Replacing this bridge is stupid. Stupid.

Matt Gouig
32250 No. Mitchell Creek Road
Bldg.A
Ft.Bragg, CA 95437

From: Matthew Alan Gouig
To: albionbridge@DOT
Subject: Useless Project
Date: Tuesday, September 10, 2024 3:04:04 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

This bridge has withstood the test of time since it was built. By doing this replacement not only will you destroy coastal beauty, environment…you will severely harm local residents and businesses. You will destroy an historical landmark and mess up the entire area for years.

Make a bike and pedestrian bridge along the main bridge and just maintain it as the years go by.

This is simply wasteful…..

Matt Gouig
32250 No. Mitchell Creek Road
Bldg.A
Ft.Bragg, CA 95437

Response to Matt Gouig

1. We note your opposition to the proposed project.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. These deficiencies cannot be addressed through routine bridge maintenance. For additional details, see Section 1.4, *Purpose and Need*, of the environmental document.

   Under the No-Build Alternative, the proposed project would not occur and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative does not meet the proposed project's purpose and need. See Section 2.2.1, *No-Build (No Action) Alternative*.

   In the event your comment is referring to rehabilitation, rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.65 MEGAN AND JOE SKORUPA

From: Joseph Skorupa
To: albionbridge@DOT
Subject: It"s time for a new bridge
Date: Thursday, September 5, 2024 11:25:22 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1 While we appreciate the emotional appeal of trying to preserve the existing bridge, that is not a viable option. The existing structure is well beyond its service life, presents ongoing environmental contamination hazards and presents significant public safety hazards.

The suggested retrofit option would remove the historic nature of the bridge design without addressing the fundamental limitations of the existing bridge. The thought of a bridge failure that would devastate the Mendocino coast economy and prevent public safety vehicles from reaching our community is a risk we are unwilling to take.

In light of the above, we prefer Option 1B as it seems to have the least negative impact on the community while preserving the spirit of the existing bridge.

2 That said, we were disappointed in the Caltrans community meeting. Caltrans missed an opportunity to engage with the community by refusing to answer questions about the impact of the design alternatives on the community. Any competent engineering team that has developed the 5 alternatives already knows the impact of the various approach and departure lanes. Claiming that Caltrans doesn't already know this was disingenuous in the least and a breach of the public trust. No wonder the citizens of Albion don't trust Caltrans.

Regards,

Megan and Joe Skorupa

Joe Skorupa
PO Box 327
Albion, CA 95410-0327

joe@skorupa.com
(510) 406-5181

Response to Megan and Joe Skorupa

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B was found to be the environmentally superior alternative and is similar to Design Option 1B (West Arch) in that it involves a spandrel arch that will for allow expansive views beyond the bridge.

2. The development of the proposed project and environmental document invited and included input from stakeholders, regulatory agencies, and the public at multiple different points (see ED Section 5.5, *General Public*).

3. Further, impacts of the each of the Build Alternatives are addressed in the environmental document; details on specific resource topics (such as parks and recreational facilities, traffic and transportation, noise, and air quality) can be found in in Chapter 3, *Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures*.

5.66 MICHAEL ISSEL

From: Michael Issel
To: albionbridge@DOT
Subject: DEIR Comment: Albion River Bridge
Date: Monday, September 9, 2024 5:22:30 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Attention:
Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental

1

My property stewardship extends along both banks of the Albion River upstream from the proposed Albion Flats Campground project staging and fabrication area at the limit line of your mitigation measure's area.

There is a deeded access agreement along the North Albion River Road extending from HW1 to my property boundary. This easement constitutes Coastal Access, a Fire Lane, and principal access for occasional heavy equipment service activities.

When considering mitigation measures with my neighbor Schooners Landing, it is critical that the intended functions and viability of my Grant Deeded Road Access be maintained, hopefully in a manner that is mutually beneficial for all concerned parties.

Caltrans observance and thoughtful consideration of mitigation measures that extend to this easement is expected and will be appreciated for generations to follow.

Sincerely,

Michael Issel
PO Box 894
4601 Albion Little River Road
Albion, CA 95410
Land: 707 937 1806
Cell: 510 368 2489
eMail: mike@thelogicworks.com

Response to Michael Issel

1. The Albion Little River Road would remain open during construction, subject to traffic control. Improvements such as widening of the existing road is proposed to allow for better construction access and accessibility as the existing road is too narrow and the turning radius would be too tight for equipment and material to be transported. The access improvements would entail grading and re-surfacing (e.g., base rock or asphalt). Improvements to Albion River North Side Road would remain following construction and would be relinquished to Mendocino County.

5.67 MIRANDA EDISON

From: Miranda Edison
To: albionbridge@DOT
Subject: Keep the Albion bridge
Date: Friday, August 16, 2024 2:55:38 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I hope you keep the old wooden bridge and rehabilitate it. Three years is an enormous amount of time, very impactful to the immediate ecosystems. It's a beautiful bridge and a historical landmark.
Let's keep the old!

Sincerely,

Miranda Edison
Elk, Ca.

PS if Cal Trans is eager to spend this kind of dough I wish they'd instead trim our roadways of all thus perilous dry grass which can start a fire. Thank you.

Sent from my iPhone

Response to Miranda Edison

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document (ED) in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including measures for impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments.

5.68 MITCHELL CLOGG

From: Mitch
To: albionbridge@DOT
Cc: Eleanor Cooney; mitchc@mcn.org
Subject: Albion River Bridge
Date: Sunday, September 8, 2024 11:35:43 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

The bridge at Albion, California is a rarity and a source of wonder. I'm 86 years old and have never seen its like anywhere. There are no "practical" considerations sufficient to justify its destruction and removal. Replacing timber that is no longer adequate is a job suitable to this place, to the skills and resources found here.

I live here and look to that bridge as a continuing source of admiration and pride. Preserving and repairing it will be work that finds universal favor. Please keep the bridge "as is" and see to its maintenance.

Sincerely,

Mitchell Clogg

Mendocino, CA

Response to Mitchell Clogg

1. We note your preference for the No-Build Alternative (i.e., keep the bridge "as-is"). Under the No-Build Alternative, the proposed project would not occur and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative does not meet the proposed project's purpose and need. See Section 2.2.1, *No-Build (No Action) Alternative*.

   In the event your comment is referring to rehabilitation, rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in the environmental document in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.69 MUIN DALY

From: Muin Daly
To: albionbridge@DOT
Subject: Do please listen
Date: Tuesday, September 10, 2024 1:52:05 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

For starters, The Woods is the number one user of our LITTLE RIVER-ALBION
VOLUNTEER FIRE DEPARTMENT. If this construction goes as CALTRANS proposes, it
will ADVERSELY effect our Volunteer Fire Department.

1

1) It will cut the equipment resources access by half - leaving half of our equipment on each side of the construction site.

2) It will compromise the amount of time our volunteers can reach EMERGENCIES.
(Medical and FIRE).

Thousands of partial and full closure hours of Highway 1, with a 126-mile detour via Highway 101 (or by poorly maintained, low-capacity county roads, 28
miles)

It's not the load that breaks you down. It's the way you carry it." -- Lena Horne

Response to Muin Daly

1. Emergency response agencies would be notified of the proposed project construction period and would have access to State Route 1 throughout construction (Standard Measure **UE-1**). A contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicle across the bridge at all times (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes. For additional detail regarding emergency services, see Master Response 7 (Traffic and Emergency Response).

   The project proposes one extended 10-hour closure, which would be overnight to cause the least disruption to the public. This closure would precede the traffic switch from the existing bridge to the replacement bridge. As stated above, emergency services would be accommodated across the bridge at all times, including during the closure.

   Further, the proposed project incorporates the use of fire-resistant materials (i.e., concrete and steel) and incorporates a defensible space on either side of the bridge including a clear recovery zone with strict limitations on vegetation. The proposed project involves widening the bridge lanes and shoulders and providing a separated pedestrian walkway, which would better accommodate emergency evacuation along SR 1 in the event of a wildfire. Following fire events, burned areas are more susceptible to erosion and landslides. The proposed project would result in a bridge that is more resilient to debris loading following wildfire events, as it involves fewer piers/foundations, is positioned to minimize encroachment on the floodplain, and includes more structurally resilient materials than the existing bridge.

5.70 NANCY CHAO

From: Nancy Chao
To: albionbridge@DOT
Subject: Albion bridge project
Date: Friday, September 6, 2024 11:25:25 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I do not believe that ripping up the beautiful Albion village and its surroundings is necessary and beneficial to the beauty of this state treasure. The estimated 150million cost of this project can be used in so many other roads/infrastructures. This bridge is in good shape and beautiful. Friends and visitors have come to stay here to enjoy the beauty.

Sent from my iPad

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Nancy Chao E-mail/Phone# nchao@mcn.org

Address (home) 3340 King Salmon City Albion State CA Zip Code 95410

Authorized Representative (name of organization or agency) _____

Address (business) City State Zip Code

COMMENTS If the Golden Gate Bridge & Bixby Creek Bridge can be maintained & repaired @ much small cost, Why can't Albion Bridge received the same consideration & historic treatment ???

If we destroy all "old" things, what are our next generations learn from their ancestors' knowledge & effort to preserve the earth & beauty!!!

I understand the budgetary difficulties. I am sure there are many other crucial repairs & improvement that Caltrans have on its books !!!

Please go & spend the Infrastructure Money somewhere else!!

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Nancy Chao

1. The environmental document extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   We note your preference for the No-Build Alternative. Under the No-Build Alternative, the proposed project would not occur and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative does not meet the proposed project's purpose and need. See Section 2.2.1, *No-Build (No Action) Alternative*.

5.71 NITA TAHLEQUAH ISHCOMER

From: Nita Ishcomer
To: albionbridge@DOT
Subject: Public Comment
Date: Monday, September 9, 2024 4:22:42 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

To Whom this may concern,

1

I am writing strictly for my main concern (I have many, I am confident others will address those concerns) over bridge replacement. I am the steward (since 2001) of the 3 Wildlife Preserves on the Albion River, that are managed by Friends of Enchanted Meadow. The Albert Cattalini Conservancy, Raven's Call and the Enchanted Meadow Wetlands Sanctuary. We are a California Non Profit. If the Albion River were a standard one, I would have no issue, however it is a tidal river. Twice a day, the river flows up past the over 3/4 miles of Wetlands we steward. then flows back to the ocean. What mitigating factors and strategies does CALTRANS plan to implement from keepingall particulates, debris and fluids from contaminating the Enchanted Meadow Wetlands Sanctuary. That being during the removal of the current bridge and the construction of the new bridge. Will there be a "net" underneath the bridge during this project, will there be a "floatation line" across the width of the river for potential fluids that may enter the river? This river is very special to me and my past family members. I forage for food and medicine from more than 12 plant species, as did my mother and grandmother did. I have also cleaned the Albion River of trash thru the years of over 20 construction bags of trash. I have also pulled and cleared the lands of non indigenous plants. I am very serious about my concerns. Not to take away from other comments, but I cleaned up the trash from the Eel Grass fields on the Albion River and no one in the community helped me. However, people hear about the bridge replacement, then all of a sudden people care about the adverse effects the replacement might have on the Eel Grass fields. I appreciate the time given to reading my comment.

RESPECTFULLY,
Nita Tahlequah Ishcomer

Response to Nita Tahlequah Ishcomer

1. During construction of the new bridge and removal of the existing bridge, the proposed project would implement a site-specific Stormwater Pollution Prevention Plan, which would include construction site Best Management Practices (BMPs) to control sedimentation, erosion, and potential chemical pollutants. A summary of the temporary BMPs that could be implemented to address stormwater impacts and protect water quality is provided in Table 30 in Section 3.3.2, *Water Quality and Stormwater Runoff.* These BMPs would include methods to minimize or eliminate the discharge of potential pollutants into storm drain inlets and receiving waters when working over water (e.g., debris netting) and turbidity controls (e.g., sheet pile cofferdams around bridge foundations, work timing). For example, **AMM-BR-3** requires that the temporary trestle piles be installed and removed during outgoing tides to deflect turbidity away from upstream eelgrass beds.

5.72 OSHA DEAN

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Osha Dean E-mail/Phone#

Address (home) 6750 L.R.Rd. 18 City Little River State Ca. Zip Code 95456

Authorized Representative (name of organization or agency)

Address (business) City State Zip Code

COMMENTS

1 First of all, there is no good reason to replace the Albion River Bridge which has not been properly maintained by Cal-Trans for years & has been purposely neglected. Cal Trans must finish the seismic retrofit, repair any damage & perform delayed maintainance to honor this Historic structure.

2 The proposed contractor, Granite Construction, has been fined millions of dollars in the last 20 years for accounting, environmental, government contracting & safety violations. This is a historic bridge on a Wild & Scenic river & must be maintained & preserved. Replacing this bridge involves many environmental hazards to endangered wildlife & the surrounding eco systems. This area's local & tourist economy is built on the preservation of our local history & Natural habitats including a heron rookery, wild salmon access to breeding grounds, fragile bluffs on the river sides & the Nationally registered Historic Resource that is the Albion River Bridge - the last remaining timber trestle highway bridge on the California coast.

3

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Osha Dean

1. The environmental document (ED) extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in ED Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. Comment noted.

3. A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including mitigations for impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments. Additionally, standard measures **BR-2** and **BR-4** would be implemented. **BR-2** includes limiting vegetation removal to the period outside the bird breeding season and, if vegetation removal is required during the breeding season, conducting pre-construction nesting bird surveys and implementing a Bird Exclusion Plan if needed. **BR-**4 includes revegetating temporarily disturbed areas.

5.73 PENNY ERWIN

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Penny Erwin E-mail/Phone# maedgee@mcn.org

Address (home) 29381 Albion Ridge Road City Albion State CA Zip Code 95410

Authorized Representative (name of organization or agency) _____

Address (business) City State Zip Code

1

COMMENTS Please keep the Albion Bridge as is" and make the repairs. I do not want or approve any of your (CalTrans) new bridge ideas.

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Penny Erwin

1. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. These deficiencies cannot be addressed through routine bridge maintenance. For additional details, see Section 1.4, *Purpose and Need,* in the environmental document.

   We note your preference for the No-Build Alternative (i.e., involving only "repairs"). Under the No-Build Alternative, the proposed project would not occur and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently and are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative does not meet the proposed project's purpose and need. See Section 2.2.1, *No-Build (No Action) Alternative*.

   In the event your comment is referring to rehabilitation, rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.74 PETER TEMPLE

From: Peter Temple
To: albionbridge@DOT
Subject: Albion Bridge project
Date: Tuesday, September 17, 2024 5:33:50 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Caltrans project managers,

1

I have lived on Albion Ridge 37 years. I am very supportive of necessary highway construction on Highway 1 and the coast in general to keep our roads safe and serviceable for all. I do not believe from all the information available that the replacement of the Albion wooden bridge is necessary at this time to serve those needs. This bridge has been shown, with annual modest maintenance, to be safe for the next 100 years and perhaps longer. Perhaps the construction of a modest walkway on both directions added to the existing bridge would be a benefit. But the funds I feel would be far better used on other safety and improvement projects on Highway 1. I feel like this project may be being pushed through because it is a large financial opportunity for contractors and the DOT in one single and therefore easier to manage project, when it seems to me there are many sections of the coast highway where projects could be undertaken that will add more to safety and reliability.

2

3

I feel like the DOT is in denial of the safety and reliability of this bridge. I can only imagine it may be because of the unique character of this current bridge's construction and the DOT does not want to work with the kind of processes that will maintain it. There are many examples of wood bridge maintenance in the United States that are safe, effective, and long lasting. There have been good reviews that show the current bridge is in remarkably good shape, and with regular standard maintenance that would cost a fraction of the proposed replacement bridge, the current bridge should easily be serviceable a good long time.

4

In addition, all the pollution, the waste, and the disruption to businesses and residences (both of which I have on Albion Ridge) for many years for what is realistically no change in driving experience or safety or convenience (two lane highways feeding a two lane bridge on both ends), it seems like the DOT in serving what the public actually needs should commit to maintaining a quite serviceable existing bridge, and spend the resources on other more critical highway improvements.

Thanks for your attention, sincerely

Peter Temple
--
Peter Temple PO Box 91 Albion, CA 95410
https://urldefense.com/v3/__http://www.petertemplestudio.com__;!!LWi6xHDyrA!6e6r2xwnhgvg9c5VxKq5dA5NxiEJItLpLKFbVLyRTRXjvrSq7K0r3PtbPYF-C5oA6F8ugnZAhzzyD02PLjksRw$
707-513-7313

Response to Peter Temple

1. The environmental document (ED) extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.

   The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.

2. The addition of a walkway to the existing bridge to provide pedestrian access is not a viable option, as there is no MASH-compliant bridge rail—a standard bridge rail capable of resisting current safety impact loading requirements—that could connect to the existing bridge's timber deck to protect pedestrians from traffic; therefore, this is not an option that was further considered. Failure to address the need for a standard bridge rail that meets current safety impact loading requirements is one of the many project objectives that the rehabilitation options fail to satisfy.

3. We note your preference for the No-Build Alternative (i.e., keep the bridge "as-is"). Under the No-Build Alternative, the proposed project would not occur and the existing bridge would remain in its current condition. The bridge would continue to deteriorate and become increasingly susceptible to damage or failure due to the marine environment, a seismic event, heavy cyclical loads, or a tsunami. Given the condition of the existing bridge, extensive recurring maintenance and structural improvement projects to maintain the bridge are being implemented currently or are anticipated. Decay and corrosion are expected to continue at an increased rate over time. It is expected that eventual bridge replacement would be necessary; however, future improvement projects are not included or evaluated as part of the No-Build Alternative. The No-Build Alternative does not meet the proposed project's purpose and need. See Section 2.2.1, *No-Build (No Action) Alternative*.

   A Rehabilitation with Widening option involving wider shoulders was considered; although the Rehabilitation with Widening option would facilitate somewhat safer pedestrian access as a result of wider shoulders, neither of the rehabilitation options would provide a comfortable, convenient, and connected facility, safely separated from live traffic, for multimodal users over the Albion River.

4. A comprehensive environmental analysis for the proposed project was completed. The ED identifies measures to avoid, minimize, and/or mitigate environmental impacts, including minimization measures for community-related impacts and mitigation measures for impacts to biological resources. See Appendix D, *Avoidance, Minimization, and/or Mitigation Summary* for a list of commitments.

5.75 PHIL MASSAM

From: Philip Massam
To: albionbridge@DOT
Subject: Arch alternatives / public comment
Date: Wednesday, September 11, 2024 1:59:41 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Good afternoon

1

Just wanted to voice support for one of the arched alternatives. Very much in keeping with some of the other bridges on this highway.

regards
phil massam

Response to Phil Massam

1. We note your support for bridge replacement with an arch design. The identified preferred alternative is Design Option 2B (East Arch), which was found to be the environmentally superior alternative and involves a spandrel arch that will for allow expansive views beyond the bridge.

5.76 PRABHLEEN SINGH

From: prabhleen singh
To: albionbridge@DOT
Subject: Prabhleen singh albion grocery owner
Date: Monday, September 23, 2024 3:06:54 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

My question is replacement of bridge effect my business all summer we get business from tourists that stay at campground,its gona effect my business ,people do fishing buy fishing gear they gona go some where else its gona effect my bussiness

Today first time i get u guys letter with wrong name of owner on it
I never been to any of ur meetings i was busy i have other stores in bay area

Sent from my iPhone XS MAX

Response to Prabhleen Singh

1. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

5.77 RICHARD

From: R
To: albionbridge@DOT
Subject: Public Comment on Granite Construction
Date: Thursday, September 5, 2024 10:35:19 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1 For this expensive and unnecessary project CalTrans has tapped a design-build contractor with a history of environmental, worker safety and financial violations.

2 The company has been fined more $22 million since 2000: A sordid mix of accounting violations ($12 million,) competition-related offenses ($8.25 million,) environmental offenses ($1.07 million,) government contracting violations ($367,000) and safety violations ($354,633.) This isn't a company we want anywhere near a state designated Wild and Scenic River and our homes.

Sincerely,

Richard.

Response to Richard

1. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The project's purpose, need, and objectives are further described in Section 1.4, *Purpose and Need*.
2. Comment noted.

5.78 RICK CHILDS

From: Rick Childs
To: albionbridge@DOT
Subject: STOP CALTRANS !! Albion River Bridge Project
Date: Thursday, August 15, 2024 3:31:10 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Hello.

Please stop Caltrans from replacing the Albion River Bridge.

1

Caltrans has a horrible make-work "If it's 25 years old, we have to replace it - so let's find some earthquake or other manufactured reason to" mentality.

The Albion River Bridge is JUST FINE. It's historic, it's beautiful, it should last indefinitely (with decent maintenance).

Why Caltrans is always pushing to destroy what's wonderful and just fine really bothers me. Look at Mendocino's Jack Peters renovation -- another bridge that was just fine, but not to Caltrans. Too narrow - too old. Think of all the traffic delays, the Huge cost, the global warming this "make-work" project has created. Unnecessarily. Rome built bridges 2000 years ago, still standing and used today. Not Caltrans. Always some BS reason to keep new projects and more money coming in.

PLEASE: tell them to go replace another "just fine" bridge somewhere else. Leave that beautiful Albion River bridge alone. I'm sure there's another unnecessary project they can sink their teeth into.

Thank you,

Rick Childs

14450 Prairie Way, Mendocino, CA 95460

From: Rick Childs
To: albionbridge@DOT
Subject: Public Comment on Community Impact and Preservation of the Historic Albion River Bridge
Date: Saturday, August 31, 2024 11:16:57 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

PLEASE STOP THIS INSANE CALTRANS PROJECT. ROME BUILT BRIDGES 2000 YEARS AGO THAT STILL STAND. NOT CALTRANS -- EVERY 20 YEARS MUST BE REPLACED. CALTRANS IS JUST A BLACK HOLE TO TAKE TAXPAYER DOLLARS.

PLUS - IT'S BEAUTIFUL AND HISTORIC - SOMETHING BULLDOZER-MENTALITY CALTRANS JUST CAN'T UNDERSTAND.

STOP THIS HORRIBLE HORRIBLE PROJECT - JUST RETROFIT IT AND MAINTAIN IT. AND LET US KEEP THIS BEAUTIFUL BRIDGE.

Rick Childs,

14450 Prairie Way, Mendocino, CA 95460

rick@mcn.org 707-964-1722

Response to Rick Childs

1. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. These deficiencies cannot be addressed through routine bridge maintenance. For additional details, see Section 1.4, *Purpose and Need,* of the environmental document.

   We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.79 ROBERT JAMGOCHIAN

From: Robert
To: albionbridge@DOT
Subject: Albion Bridge rebuild
Date: Thursday, September 19, 2024 8:00:32 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

It is time to replace the Albion Bridge. The infrastructure of the bridge is old, outdated and a hazard waiting to happen.

Alternative 2B built west of the existing bridge with arch is a great design - that is my vote.

2B or not 2B… that is the question (sorry had to)..

Please do us all a favor and do the right thing. Replace the bridge.

respectfully,

Robert Jamgochian
Mendocino CA

Response to Robert Jamgochian

1. We note your support for bridge replacement with an arch design. The identified preferred alternative is Design Option 2B (East Arch), which was found to be the environmentally superior alternative and involves a spandrel arch that will for allow expansive views beyond the bridge.

5.80 ROGER AND GEORGIA COLLIN

From: R & G Collin
To: District 1 PIO@DOT
Subject: Attn: Lisa Walker RE: My Comments Re: Albion Bridge Project
Date: Saturday, September 7, 2024 1:40:20 PM
Attachments: treated_wood_specguide-1.pdf
History of Albion Bridge Construction.docx

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Walker

1

I am a homeowner, and general contractor, and my wife Georgia and I each commute to and from the Little River and Mendocino, and Fort Bragg areas on a daily basis. We also patronize Albion River Campground, the Albion Store and Village Hardware in Albion, and go to and from our home on Cameron Road to Albion, Little River, and Mendocino in the evenings for social occasions.
I have been canoeing on the Albion River for 40 years, and kept a boat at Albion River Campground for many years, and I am familiar with most aspects of various environmental concerns in the Albion River, Albion Bay and near-shore fishing areas. I have been at Albion Flats during many occasions of Albion River flooding during high tides, waves breaking across the campground, docks breaking loose and washing out to sea, and have worked on Albion Campground infrastructure, buildings and water an septic systems.

2

From reading the descriptions of the bridge project in the EIR, we have come to the conclusion that the entire project is ill-conceived, poorly thought out, and that all the parts, including the questionable environmental reporting constitute a cover-up of the potential damages to the entire coastal community, the infrastructure of the campground, the environment, and the ability of local residents to carry out the daily necessities of their lives.

The EIR/EIS was obviously pieced together from Cal Trans' wish-list of conditions necessary to replace the bridge, rather than any honest research perspectives regarding the following list of concerns.

We therefore protest Cal Trans' bridge replacement plans based on ALL of the points listed below. Cal Trans need to re-think the project, and subject it to a thorough independent third-party environmental review on behalf of the citizens and residents of Albion and the local Mendocino Coast.

3

Cal Trans has been disingenuous in the reporting in the PEAR, regarding the possibilities of remaining deadly arsenic and chromium in the bridge timbers, by not revealing the results of any core-samples taken from the treated timbers. The original pressure treatment of the timbers, according to the Wolman website, may have resulted in a total of 171,000 lbs. of CCA injected into the 825,000 board feet

of Doug Fir timbers...possibly putting the entire community of Albion Village at risk during the demolition of the bridge, and mass poisoning of the Flats, River and Bay environment.

4

- The issue of noise during three to five years of construction

- The community impact of replacing a historic bridge
- The impact to air quality during a lengthy, complex construction project
- The energy consumption of a complex construction project
- The hydraulic and floodplain considerations of the proposed project
- The traffic disruption of a three- to five-year construction project
- The proposed project's impact on sensitive biological resources
- The general environmental impact of the proposed bridge replacement
- The impact that the proposed project would have on my work commute
- The impact that the proposed project would have on my business

Thank You,

Roger and Georgia Collin

1361 Cameron Rd., Elk, CA 95432

5

The Toxic History of the Albion Bridge

Albion Bridge Facts and Statistics

The bridge was built with 825,000 board feet of Wolmanized, pressure-treated Douglas fir. (from Article in Fort Bragg Advocate)

(https://www.advocate-news.com › 2020 › 06 › 09 › albion-river-bridge-completed-76-years-ago)

All Wolmanized® wood is treated with CCA-Type C, which is composed of the following, from Wolmanized Pressure Treated Wood website: (http://www.americanpoleandtimber.com/wp-content/uploads/treated_wood_specguide-1.pdf)

47.5% Hexavalent Chromium (CrO3)
18.5% Copper (CuO)
34.0% Arsenic (As205)
Applications, and concentration of CCA preservative, expressed in Lbs. per cubic foot..(PCF) injected into wood under pressure.

Exposure Catagories: PCF applied per category
Salt Water splash .....0.60 pcf
Foundation, Fresh Water.....0.08 pcf
Salt Water Emersion.....2.50 pcf
AWPA Use Category System
Salt Water Exposure, North of San Francisco and New Jersey.....Pilings and Bulkheads: Category UC5 A/B (2.50 pcf)

The Math to convert 825,000 Board Feet to Cubic Feet:
1 Board Foot = 144 cu. Inches, or one 1"x12" inch board, 12 inches long
To convert 825,000. Board Ft. to Cu. Ft.: 825,000 divided by 12 = 68,750 Cu. Ft. of treated timbers in Albion Bridge

If the timbers were treated with the maximum amount of CCA,(Salt Water Immersion) Category UC5, which is 2.5 Lbs. of CCA per Cu. Ft.: (2.5 X 68,750) the total amount of CCA toxic, carcinogenic, mutagenic preservatives originally injected into the kiln-dried timbers be **171,875 pounds**.

If the Category for "Salt Water Splash", was used, (.60 Lbs. per cu. Foot X 68750) the total would be **41,250 Lbs**. of CCA injected.
Individual totals for components of CCA possibly injected into the timbers of Albion Bridge, at concentration of 2.50 Lbs. Per cubic foot, result in:

H. Chromium 47.5 % X 171,875 (total CCA) = 81,640.625 total lbs. of Hexavalent Chromium in Albion Bridge
Copper, 18.5 % X 171,875(total CCA) = 31,796.875 total lbs. of Copper in Albion Bridge
Arsenic 34.0 % X 171,875 (total CCA) = 58,437.5 total lbs. of Arsenic in Albion Bridge

In the 400+ page Preliminary Endangerment Assessment Report CalTrans commissioned from GEOCON Consultants, in 2017, the sand, water, wood and concrete surfaces were carefully collected and tested for residual toxins .
A representative from the California Department of Toxic Substances Control overseeing the investigation, wrote the following in response to a question by a community member: "Arsenic and hexavalent chromium concentrations we have found are higher than what DTSC considers acceptable for a residence. When we estimate risk for a residence, we are assuming a 24 hour, 365 day/year presence. However, since the areas of contamination are not a residence, but rather in a recreational setting, we do not necessarily think there is an issue with current land use."

The PEAR, is painstakingly thorough, and documents every possible detail of the historic Albion River Campground site, and, through scientific analysis, attempts to put to rest any questions regarding possible "endangerments" to "receptors" whether human, plant or animal during bridge replacement activities.

One detail conspicuously absent from the otherwise exhaustive report, is any mention whatsoever of *results or analysis of any testing for current residual CCA toxins still contained in the structural Doug Fir timbers*. The procedures described in the report focus only on the presence of toxins in the sand, dirt and water around the bridge, but do not state the results of any core-samples obtained from the timbers.

This failure to address and publish findings concerning toxic elements liable to be released during any repairs or demolition of the bridge, whether an oversight, or deliberate, constitute a distraction from the real and present dangers to the community, local ecology and the environment which is impossible to ignore.

Hexavalent Chromium, (think Erin Brokovitch) is carcinogenic and mutagenic to humans, capable of corrupting the DNA of future generations, and known to cause many cancers. Exposure to Arsenic is associated with cancer and non-cancer effects in nearly every organ of the human body. Copper (Cu) has sparked widespread global concern as one of the most hazardous metals to aquatic animals.

Amazingly, the current EIR/EIS reveals that CalTrans/GeoCon has given the bridge project a pass:

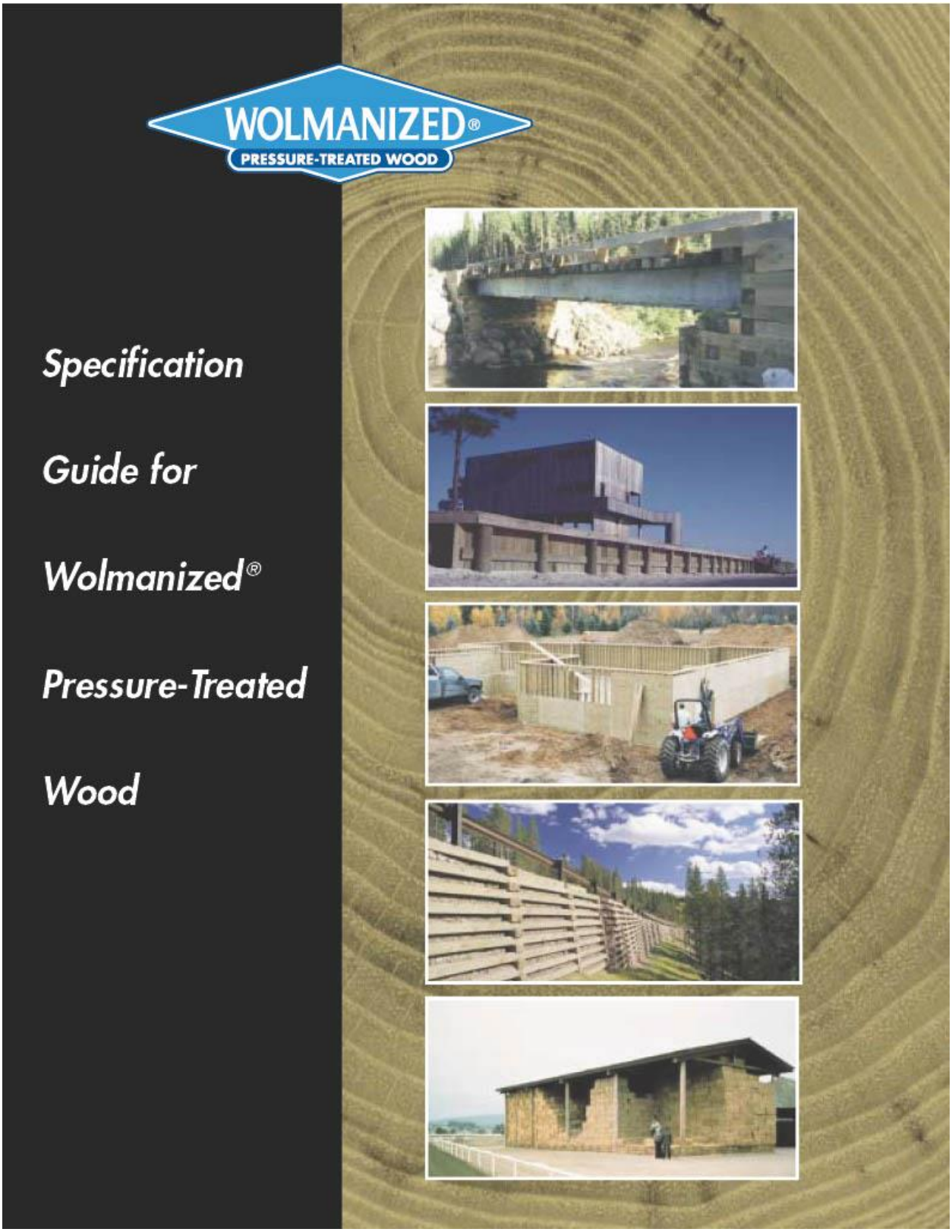
"…As of December 22, 2022, the Albion River Bridge is listed as "No Evidence of Release" and is under a voluntary cleanup agreement with DTSC. The identified contaminants of concern are arsenic and lead in soil and sediment…."

"….The PEA determined
that there was no excess human health risk posed by the potential contaminants of concern in areas analyzed inside and outside of the state ROW and recommended removal of the bridge structure's treated timber (i.e., source of arsenic)…."

"…Information obtained from DTSC on October 10, 2022, indicated that the case file documents were currently under review and either the regulatory case would be closed or further action directed (Geocon Consultants, Inc., 2022). DTSC later determined that release was minimal and associated with treated wood (DTSC 2022). On December 15, 2022, DTSC indicated that they do not need to provide oversight for the proposed replacement of the Albion River Bridge…"

In response to questions regarding possible pollution of the campground below the bridge, CalTrans answered:

"The amount of toxic and carcinogenic sawdust generated by drilling sawing, grinding, and bolt removal during the construction phase of the project would be nominal and *not possible to measure*. Contractor would be required to have full containment. No toxic materials will be disbursed over the campground."


WOLMANIZED®
PRESSURE-TREATED WOOD
Specification
Guide for
Wolmanized®
Pressure-Treated
Wood

WOLMANIZED®
PRESSURE-TREATED WOOD

Wolmanized® Pressure-Treated Wood

Wolmanized® wood is poles, piles, timbers, posts, or plywood that is pressure-treated with CCA preservative to provide structural protection from termites and fungal decay. For 70 years, CCA-treated wood has been specified in a wide variety of applications; as of December 30, 2003, Wolmanized® wood may be produced for only the uses shown in the next section. When used as recommended, CCA-treated wood is harmless to people, plants, and animals. Its use provides environmental benefits as well as decades of service.

When to Specify

Specify Wolmanized® wood and plywood for applications in which conditions conducive to termites and fungal decay are present. This includes wood that will be in contact with water, soil, concrete or masonry, subject to periodic wetting, or exposed to moisture or high humidity. Wolmanized® wood is suitable for a wide variety of applications, including:

- Lumber for Salt Water Use
- Piling
- Poles
- Plywood
- Highway Construction
- Poles, Piles and Posts Used as Structural Members on Farms
- Agricultural fence posts (round, half-round, quarter-round)
- Marine Construction
- Permanent Wood Foundations
- Building Poles and Posts
- Sawn Structural Timbers
- Sawn Crossarms
- Structural Glued Laminated Members
- Structural Composite Lumber
- Shakes and Shingles
- Cooling Towers

For residential and other applications requiring a next-generation preservative, specify Wolmanized® Natural Select® wood (www.naturalselect.com).

Contents

What is CCA & How Does It Work?..... 3
Retention, Penetration, Use Category System 4
Recommended Hardware, Species, Design Values, Marine Grade..... 5
Safety & Handling, The Treating Process..... 6
Model Specification..... 7

Features & Advantages

- Protection against rot, fungal decay, and termites
- 70 year successful track record
- Easy to work with, repair, and modify with common tools
- Strong, resilient, versatile, and economical
- Backed by Arch Wood Protection, the world's leader in wood preservation technology

What is CCA and How Does It Work?

The chemical used to preserve Wolmanized® pressure-treated wood is a mixture of oxides of copper, chromium, and arsenic and known as CCA. The preservative has been formulated to render wood useless as a food substance for termites and fungi while keeping the wood attractive, clean, odorless, non-staining, and safe to handle when used as recommended.

Chemical Composition of CCA-C

All Wolmanized® wood is treated with CCA-Type C, which is composed of the following:

Hexavalent Chromium (CrO_3)	47.5%
Copper (CuO)	18.5%
Arsenic (As_2O_5)	34.0%

Unlike the commercially produced trivalent arsenic, the arsenic in Wolman® CCA is in the form of inorganic pentavalent arsenate — a naturally occurring trace element. In the treatment process, described on Page 6, the pentavalent arsenate becomes fixed, or chemically bound, in the wood cells as highly leach-resistant insoluble precipitates.

The effectiveness of preservatives at various retentions in different species is evaluated using test stakes. Arch monitors some 50,000 stakes in plots worldwide.

More on Fixation ...

The reaction of chromated copper arsenate with the wood substrate is termed "fixation" because the preservative compounds are fixed in the treated wood in a highly insoluble state. However, some chemical may migrate from treated wood into surrounding soil over time and may also be dislodged from the wood surface upon contact with the skin. Fixation accounts for the permanency of the preservative in the treated wood, which explains the leach resistance and durability of the product.

The fixation mechanism is complex and the reactions involved are primarily dependent upon wood species, preservative formulation, concentration, and temperature. The result, however, is that the preservative becomes leach-resistant precipitates.

Retention and Penetration

Wolmanized® pressure-treated wood is treated to various retention levels that are intended to protect the wood for particular applications. Retention levels indicate the amount of preservative retained in the wood in a specific assay zone. In North America, retention is expressed in pounds per cubic foot (pcf).

Retention levels or treating quality procedures are marked on Wolmanized® wood. The accompanying table outlines CCA retention levels required by the American Wood-Preservers' Association for various applications.

Retention varies with depth in the wood, so preservative penetration also affects wood longevity. In species with large amounts of sapwood, such as southern and red pine, the preservative must penetrate 2.5 inches or 85% of the sapwood to meet standards. In western species that are predominantly heartwood, the wood is incised to ensure a treated shell, and any cut surfaces should be field-treated in accordance with AWPA standard M4 with a preservative containing at least 2% copper.

AWPA Retention Requirements[1]

Application	Use Category	CCA (pcf)
LUMBER, TIMBERS, AND PLYWOOD		
Above ground	1, 2, 3A, 3B	0.25
Ground / Fresh Water Contact	4A	0.40
Salt Water Splash	4B	0.60
Permanent Wood Foundation	4B	0.60
Salt Water Immersion	5B	2.50
POLES AND PILES		
Structural Poles	4B	0.60
Foundation / Fresh Water	4C	0.80
Salt Water Immersion	5B	2.50[2]

[1]Wolman® CCA preservative meets or exceeds AWPA P5 and Federal Standard TT-W-550. The treating process and the results above meet or exceed Federal Specification TT-W-571 and AWPA Commodity Standards as applicable.
[2]For round piling used in the northern zone (New Jersey and north on the East coast, north of San Francisco Bay on the West coast), a retention of 1.50 pcf is acceptable (UC5A).

AWPA Use Category System

The American Wood-Preservers' Association, which establishes the standards for preservatives and treated wood, is introducing a new Use Category system, based on the service conditions for wood rather than on wood commodities. It is designed to reduce confusion among specifiers and consumers. Most building codes reference AWPA standards, so the Use Category system will replace the Commodity standards in codes. At right is a summary of AWPA Use Categories. Shown in yellow are ongoing uses for CCA-treated wood.

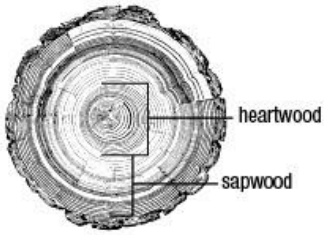
Category	Description	Examples
UC1	Interior, not in contact with ground or foundation	Interior furniture, millwork
UC2	Interior, subject to dampness	Interior beams, flooring, sill plate
UC3A	Exterior, above ground, coated	Plywood siding
UC3B	Exterior, above ground, may be finished	Highway bridge railing
UC4A	Exterior, ground or freshwater contact in areas with low risk	Fence posts, deck posts, poles
UC4B	Exterior, ground or freshwater contact, severe environments, high potential for deterioration	Utility poles, building poles, Permanent Wood Foundations
UC4C	Exterior, ground or freshwater contact, very severe conditions or very critical structural components	Freshwater piling, foundation piling, utility poles in semi-tropical or tropical environments
UC5A	Saltwater exposure – north of San Francisco and New Jersey	Piling, bulkheads
UC5B	Saltwater exposure – south of San Francisco on West coast, New Jersey through Georgia on East coast	Piling, bulkheads
UC5C	Saltwater exposure – south of Georgia, Gulf Coast	Piling, bulkheads
UCFA	Fire protection, weather-shielded	Framing
UCFB	Fire protection, exterior	Siding, shakes, stairways

Recommended Hardware

The conditions that are conducive to attack by fungal decay and termites also promote metal corrosion. Hot-dipped galvanized fasteners (meeting ASTM A 153) and connectors (ASTM A 653 Class G185 sheet), or better, are recommended for protection against the effects of moisture often present where treated wood is used. For Permanent Wood Foundations, use 304 or 316 stainless steel. **Aluminum should not be used in direct contact with this wood.**

Heartwood vs. Sapwood

Typically, the heartwood–or center part of the tree–may be quite dense and less porous than the sapwood–the younger, outer portion of the tree. The heartwood is naturally more resistant to attack by pests, but it is also less accepting of preservative. Therefore, in marine conditions, for example, where wood-destroying organisms are a threat, it is wise to specify wood with a minimum of heartwood exposed (seawall grade) to be assured of adequate preservative protection.



Treatable Species

The following species of wood can be effectively treated with Wolman® CCA preservative in accordance with American Wood-Preservers' Association standards. Although these species are listed by AWPA, reaching required penetration and retention levels is very difficult in some of them. The term "treated to refusal" indicates that the wood has retained as much preservative as possible, but not enough to meet standards or ensure good performance.

- Southern Pine Group
- Ponderosa Pine
- Red Pine
- Hem-Fir Group*
- Jack Pine*
- Lodge Pole Pine*
- Sugar Pine*
- White Pine*
- Radiata Pine
- Caribbean Pine
- Coastal Douglas Fir*
- Western Larch*
- Redwood*
- Sitka Spruce*

**In order to secure penetration of preservative in these species, incising (puncturing the lateral surfaces of the wood) is required.*

Design Values

Since pressure treatment with Wolman® CCA preservative does not alter the natural characteristics of wood, the design values for untreated lumber and plywood should be used in accordance with the National Design Specification for Wood Construction (2001 edition), issued by the American Forest and Paper Association.

Wood products which have been preservative-treated are referenced in Section 4.3.14 and 6.1.4. If lumber is not dried after treatment, or if the end use will result in a moisture content exceeding 19%, wet service factors shall be applied (see 4.1.4 and 4.3.3).

In addition, load duration factors greater that 1.6 shall not apply to structural members. The design values for all acceptable species and grades of lumber are given in the Supplement to the National Design Specification.

Marine Treated Wood/Seawall Grades

Marine treated lumber, timber and piles are pressure-treated with higher concentrations of Wolman® CCA preservative to withstand the harsh exposures and destructive organisms common in marine environments. Retention levels range from 0.40 pcf for soil contact to 2.50 pcf for saltwater immersion. Marine treated wood should be specified for all marine applications, including piling and bulkheads.

To ensure adequate treatment against marine borers, two lumber grades have been established for saltwater applications. "Marine" grade, free of heartwood on all four sides, is appropriate where all sides are vulnerable to marine organisms, such as in jetties. "Seawall" grade, which is suitable for sheet piling, is heartwood-free on one wide side (marked "This side seaward") and on both narrow sides: only the side intended to face earth may have exposed heartwood.

Safety & Handling

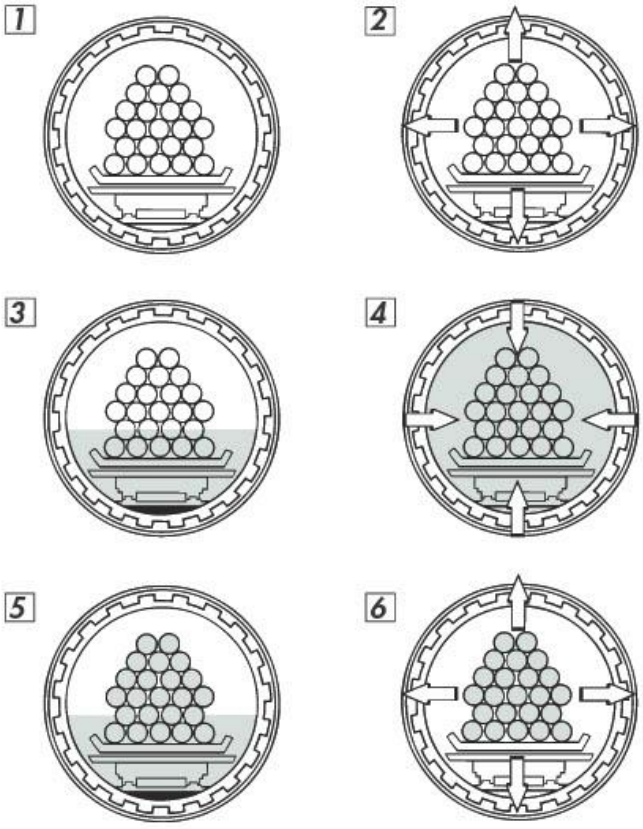
The fixation which occurs subsequent to the treating process makes Wolmanized® wood safe for the environment and for the individual user when handled as recommended. Once the Wolman® CCA is fixed in the wood cells, it is highly leach-resistant. With seven decades of usage, its harmlessness to people, plants, pets, and the environment has been documented by academic and governmental researchers and agencies. For studies demonstrating the safety of CCA-treated wood in various applications, see www.wolmanizedwood.com/safe.html.

As a federally registered pesticide, Wolman® CCA preservative undergoes a formal investigation and evaluation by the Environmental Protection Agency periodically. Based on an abundance of documentary evidence, the EPA deems Wolmanized® wood to be suitable for uses described in this brochure. Other agencies also oversee aspects of the production, transportation, and use of CCA and CCA-treated wood. Material Safety Data Sheets are available from the treating companies licensed to manufacture Wolmanized® wood.

The Wolman® Treating Process

The basic treating process is simple and highly controlled. [1] Lumber, timbers, or plywood is loaded onto small rail or tram cars. The trams are moved into a large, horizontal treating cylinder. [2] The cylinder door is sealed and a vacuum is applied to remove air from the cylinder and the wood cells. [3] Preservative solution is then pumped into the cylinder and [4] the pressure raised to about 150 pounds per square inch, forcing CCA into the wood. Treating time varies depending on species of wood, commodity being treated, and the amount of preservative to be impregnated.

[5] At the end of the process, excess treating solution is pumped out of the cylinder and back to a storage tank for later re-use. [6] A final vacuum removes excess preservative from wood cells. The cylinder door is opened and the trams are pulled out. The wood is wet, so it is kept on a concrete pad until any dripping ceases.



Model Specification

The following paragraphs are for insertion into a section of generic specifications or generic/proprietary specifications covering rough carpentry to include preservative treated wood. Notes shown in italics should not be included in the final specification.

PART 1 GENERAL

1.01 REFERENCES

A. American Wood-Preservers' Association (AWPA) 2001 Book of Standards:
1. Standard C1, All Timber Products — Preservative Treatment by Pressure Process.
2. Standard C2, Lumber, Timber and Ties (salt water use only).
3. Standard C3, Piles.
4. Standard C4, Poles.
5. Standard C9, Plywood.
6. Standard C14, Wood for Highway Construction.
7. Standard C16, Wood Used on Farms.
8. Standard C18, Marine Construction.
9. Standard C22, Lumber and Plywood for Permanent Wood Foundations.
10. Standard C23, Round Poles and Posts Used in Building Construction.
11. Standard C24, Sawn Timber Used to Support Residential and Commercial Structures.
12. Standard C25, Sawn Crossarms
13. Standard C28, Structural Glued Laminated Members and Laminations Before Gluing.
14. Standard C30, Lumber, Timbers, and Plywood for Cooling Towers (2002 Book of Standards).
15. Standard C33, Structural Composite Lumber.
16. Standard C34, Shakes and Shingles.
17. Standard P5, Waterborne Preservatives.
18. Standard M4, Care of Preservative-Treated Wood Products.

A. National Institute of Standards and Technology (NIST):
1. PS 1, U.S. Product Standard for Construction and Industrial Plywood.
2. PS 20, American Softwood Lumber Standard.

A. Western Wood Preservers Institute
1. Best Management Practices for the Use of Treated Wood in Aquatic Environments.

1.02 QUALITY ASSURANCE

A. Qualifications:
1. Treatment Facility: Provide treated materials that have been produced under the appropriate ASTM or ANSI standard or an ALSC recognized quality assurance program.

1.03 DELIVERY, STORAGE, AND HANDLING

If drying after treatment is selected in part 2, retain the two paragraphs below.
A. Packing and Shipping:
1. Provide waterproof covers for preservative treated wood during shipment.
Storage and Protection:
1. Store preservative treated wood off the ground and protected from the weather.

PART 2 PRODUCTS

2.01 MANUFACTURERS

A. Preservative: Wolman® CCA Type C; Arch Wood Protection

2.02 MATERIALS

Lumber for preservative treatment must conform to the following specifications. Select grade and species below. Other grades and species may be acceptable, contact Arch to verify.

A. Lumber: In accordance with NIST PS 20 and as follows:
1. Grade: No. 1
1. Grade: No. 2
1. Grade: No. 1 Dense.
1. Grade: No. 2 Dense.
1. Grade: Select Structural.
2. Species: Southern pine.
2. Species: Red pine.
2. Species: Ponderosa pine.
2. Species: Hem-fir.
3. Surfacing: S4S.
3. Surfacing: S1S2E.
3. Surfacing: Rough.
4. Moisture Content: 19%, maximum.

Plywood for preservative treatment must conform to the following specifications. Select panel grade, exposure durability, species group, and structural rating from below.

A. Plywood: In accordance with NIST PS 1 and as follows:
1. Panel Grade: A-C.
1. Panel Grade: B-C.
1. Panel Grade: C-C.
1. Panel Grade: C-D.
2. Exposure Durability: Exterior.
2. Exposure Durability: Exposure 1.
3. Species Group: 1.
3. Species Group: 2.
4. APA Structural Rating: Structural I.
4. APA Structural Rating: Structural II.

C. Preservative: CCA Type C in accordance with AWPA P5 and formulated using only the oxide form of the chemicals.

2.03 PRESERVATIVE TREATMENT

Select required end uses below.
A. Pressure Treatment: In accordance with the requirements of AWPA Standard C1 and in accordance with the following standards for indicated end uses:
1. Lumber (salt water use only): C2.
2. Piling: C3.
3. Poles: C4.
3. Plywood: C9.
4. Highway Construction: C14.
5. Poles, Piles and Posts Used as Structural Members on Farms: C16.
6. Agricultural Fence Posts: C16.
7. Marine Construction: C18.
8. Permanent Wood Foundations: C22.
9. Building Poles and Posts: C23.
10. Sawn Timbers: C24.
11. Sawn Crossarms: C25
12. Structural Glued Laminated Members: C28.
13. Cooling Towers: C30.
14. Structural Composite Lumber: C33.
15. Shakes and Shingles: C34.

Select required applications below.
B. Preservative Retention: In accordance with the specified standard, determined in the specified zone for the following applications:
1. Above Ground.
2. Ground or Fresh Water Contact.
3. Wood Foundation or Structural Poles.
4. Salt Water Immersion.

A. Moisture Content: Drying after treatment is not required.
Select Above or Below.
B. Moisture Content: Dry after treatment as follows:
1. Lumber: 19%, maximum.
2. Plywood: 18%, maximum.
3. Plywood: 15%, maximum (for Permanent Wood Foundation).

Retain below if fixed preservative is required for aquatic environments.
A. Pressure Treatment of Materials for Aquatic Environments: In accordance with the Best Management Practices published by the Western Wood Preservers Institute.

2.05 SOURCE QUALITY CONTROL

A. Inspection:
1. Untreated Material:
Lumber: Provide lumber that has been inspected and graded before treatment by an ALSC recognized grading agency.
Plywood: Provide plywood that has been inspected and graded before treatment by a code-recognized inspection and testing agency.
Poles: Provide poles that have been inspected and graded before treatment in accordance with ANSI standards.
Piling: Provide piling that has been inspected and graded before treatment in accordance with ASTM standards.

1. Treated Material: Provide treated material that bears the quality mark of an ALSC-recognized agency which maintains supervision, testing, and inspection of the quality of the product.

PART 3 EXECUTION

3.01 INSTALLATION

Below is not generally required for pine species less than 5 inches thick in the eastern and central U.S. No other special installation specifications are required for preservative treated wood.
A. Surface Treatment of Field Cuts: Treat field cuts on members that provide structural support to a permanent structure in accordance with AWPA Standard M4.

Other Products in the Wolmanized® Wood Family

Arch Wood Protection and Arch Treatment Technologies produce wood preservatives and additives that enhance the qualities of wood by pressure treatment processing. The companies are licensors of a list of other respected brands of treated wood:

Wolmanized® Natural Select™ wood
www.naturalselect.com
An effective and proven alternative to traditional treated wood commonly used for residential and commercial applications.

Dricon® FRT wood
www.dricon.com
Fire retardant treated lumber and plywood for weather-shielded applications.

FRX™ exterior FRT wood
www.frxwood.com
Fire retardant treated lumber and plywood for exterior applications.

SillBor® wood
www.wolmanizedwood.com/sillbor.htm
Borate-treated wood for sill plate and framing.

Arch Wood Protection, Inc.
Arch Treatment Technologies, Inc.
1955 Lake Park Drive, Suite 250
Smyrna, GA 30080
Tel: 770.801.6600
E-mail: info@wolmanizedwood.com • Web: www.wolmanizedwood.com

© 2004 Arch Wood Protection, Inc.

WOL-849

It's wood.

In addition to the treatments that enable the wood to last a long time or resist flames, our brands have all of the environmental and other advantages associated with wood itself. They extend forest resources; the source is a renewable resource grown on managed timberlands, requiring less energy to produce than alternative building materials and offering greater insulation value; and, because of its lighter weight, wood can often be installed with lighter equipment having less environmental impact. Wood offers excellent workability with common construction skills and tools, plus it provides design flexibility and economy. Wood is generally less costly than alternative building materials and is considered easier to work with, not to mention aesthetically preferable in many applications.

Response to Roger and Georgia Collin

1. Comment noted.
2. The environmental document (ED) was prepared in compliance with applicable state and federal laws, regulations and requirements under CEQA and NEPA. The document underwent extensive Quality Assurance/Quality Control (QA/QC) to ensure the document satisfied all legal requirements.

   A comprehensive environmental analysis for the proposed project was completed. Avoidance and minimization measures were identified to reduce impacts. Further, mitigation measures were identified for potentially significant impacts, including to aesthetics, biological resources, and cultural resources. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level, while impacts to aesthetics and cultural resources would remain significant and unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls.

   To ensure that the public had adequate opportunity to comment on the draft EIR/EIS, two public meetings were conducted—one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period. A subsequent independent third-party review of the ED is not warranted.

3. The ED refers to the results of preliminary site investigations (PSIs) and a preliminary endangerment assessment (PEA). The PSIs indicated the presence of elevated metals (arsenic, lead, zinc, and chromium) beneath the bridge site, with the primary contaminant of concern being arsenic. Arsenic levels decrease rapidly with distance (within a few feet) from the bridge's concrete footings to within a range that would be consistent with background levels. The PEA determined that there was no excess human health risk posed by the potential contaminants of concern in areas analyzed inside and outside of the state right of way and recommended removal of the bridge structure's treated timber (i.e., source of arsenic). See ED Section 2.2.6, *Unique Features of Build Alternatives*.

   The existing bridge has preservative-treated timbers in a state of ongoing deterioration. The proposed project would remove the treated timbers. Treated wood waste would be managed and disposed of in accordance with measures described in Section 3.3.5, *Hazardous Waste/Materials*, including Standard Measures **HW-1** through **HW-4,** which would minimize potential impacts to human health and the environment due to accidental release of hazardous materials.
4. The bullet points appear to be links to template comment letters. See responses to template comment letters in Chapter 6, *Template Letters*.

5. The attachments to the comment letter titled “The Toxic History of the Albion River Bridge” and “Wolmanized Pressure Treated Wood” are noted. See also Response 3 above.

5.81 RONALD KARISH

From: Ronald Karish
To: albionbridge@DOT
Subject: Public Comment on Biological Resource Disruption and Preservation of the Historic Albion River Bridge
Date: Sunday, September 8, 2024 12:40:11 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1 The Albion River Bridge Stewards have made available ten possible public comment templates for interested persons to use in expressing their concerns about the proposal to replace the bridge. Individually and/or collectively these comment templates present sufficient argument against replacement and in favor of rehabilitation and maintenance of the exiting structure.

2 I am adding my voice in support of all of these arguments.In general, I feel that space should be made in the design of our state's transportation solutions to include consideration of aesthetic, historic, and emotional factors. Newer, bigger, and faster cannot be our only goals.

Both the residents of Mendocino county and its many visitors are here by choice to be in the atmosphere of the natural wondrous beauty of this specific place.

We are not just concerned with speeding through it!

3 I want to use this letter to comment on a nearby bridge, The Philo Greenwood Road bridge crossing the Navarro River at Hendy Woods State Park.This county bridge is eligible for federal funding but the project must follow CalTrans guidelines. CalTrans has determined that the traffic flow on the bridge necessitates replacing its current one lane with two (plus a shoulder and a pedestrian lane.) Like the Albion Bridge, this perfectly placed gem can be much more economically rehabilitated; ecoomically in terms of money, disturbance to the environment, and disruption to the flow of community activities. The very fact of it being a one way bridge creates the need to slow down. This transfers to greater safety for the rest of Greenwood Rd. (steep, narrow, and winding all the wy to Elk) and especially for the safety of park visitors and swimmers and fishermen at the long used part of the river adjacent to the bridge.

Slow down.

Thankyou.

Ronald Karish

Response to Ronald Karish

1. See responses to template comment letters in Chapter 6, *Template Letters*.
2. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in the environmental document (ED) in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The proposed project is not a capacity-increasing project. Neither traffic patterns, roadway capacity, nor posted speed limits would change as a result of the proposed project.
3. Comment noted. The Philo Greenwood Road Bridge is outside the scope of the project and was not analyzed in the ED.

5.82 SHARON L. PETROSINOWILSON

From: Sharon Wilson
To: albionbridge@DOT; sharon.petrosino@gmail.com
Subject: Albionbridge public comment
Date: Tuesday, August 13, 2024 10:32:56 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Mendocino County Board of Supervisors\

501 Low Gap Road, Room 1090

Ukiah, CA 95482

CalTrans: Attention: Liza Walker, North Region
Environmental, 1656 Union Street, Eureka, CA 95501

Dear Members of the Mendocino County Board of Supervisors and Ms. Walker:

1

I am writing to express my strong support for the rehabilitation of the Albion River Bridge, rather than its replacement. The Albion River Bridge is not just a critical piece of infrastructure; it is a unique and irreplaceable historical landmark that represents an important chapter in California's history. As the last tall wooden highway bridge in the state, its preservation should be a priority, not only for the residents of Albion but for all Californians who value our shared cultural heritage.

Over the years, the Albion Bridge Stewards have diligently worked to protect this community icon, even securing its place on the National Register of Historic Places and the California Register of Historic Resources. This recognition is a testament to the bridge's historical and architectural significance, making it all the more crucial that any proposed changes are carefully considered.

Caltrans initially promised the Albion community that both rehabilitation and replacement options would be considered on equal footing. However, the recent decision to move forward with a $135 million replacement-only plan seems to have abandoned this commitment. This shift not only disregards the community's preference for rehabilitation but also raises concerns about the transparency and inclusiveness of the decision-making process.

The alliance between the Albion Bridge Stewards and Keep Big Sur Wild, along with the support of Monterey County's Board of Supervisors in a similar battle, demonstrates that preserving historic bridges is a cause that resonates across California. In places where historic preservation is prioritized, solutions such as the installation of safety lights for

cyclists on narrow bridges have been implemented effectively. This shows that with creativity and community involvement, rehabilitation can meet both safety standards and preservation goals.

2

Replacing the Albion River Bridge would also have significant economic repercussions. The proposed three-to-five-year construction period would cause unnecessary delays, disrupting local businesses that rely on tourism, including the two upscale restaurants, inns, the Albion Grocery, and the Albion River Campground & Flats Cafe. Many tourists who visit the Mendocino Coast may choose to go elsewhere during this extended construction period, potentially leading to long-term economic harm.

3

Furthermore, the environmental impact of demolishing the bridge and the challenges associated with safely disposing of its materials cannot be overlooked. The community has long voiced concerns about the potential contamination and the lack of clear plans for post-demolition waste management. Rehabilitation, on the other hand, would minimize these environmental risks and align more closely with the values of sustainability and conservation that are so important to our region.

4

It is vital that Caltrans honors its original commitment to consider rehabilitation as a viable option. The historic value of the Albion River Bridge, combined with the community's strong desire to preserve it, warrants a thorough and transparent exploration of all alternatives that could extend the life of this iconic structure.

I urge the Board of Supervisors to advocate for the rehabilitation of the Albion River Bridge and to ensure that Caltrans engages in a meaningful dialogue with the community to find a solution that respects both our heritage and our future.

Thank you for your attention to this important matter.

Sincerely,

Sharon L. PetrosinoWilson

Response to Sharon L. PetrosinoWilson

1. We note your preference for rehabilitation of the bridge.

   Pursuant to 40 CFR 1502.14 and CCR Title 14 §15126.6, a reasonable range of alternatives was analyzed.

   Alternatives were identified based on past studies and comments received from stakeholders, including regulatory agencies and the community. The resulting alternatives were evaluated and refined through a sequential screening process (preliminary screening and initial screening) to identify the reasonable alternatives that best meet the proposed project's purpose and need.

   In accordance with Section 15126.6(c) of the CEQA Guidelines, the factors that may be used to eliminate an alternative from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

   Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives, as described in the environmental document (ED) in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

2. The identified preferred alternative (Design Option 2B – East Arch) is anticipated to take three years to construct.

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

3. Treated Wood Waste (TWW) from the bridge structure, utility poles, and guardrails would be generated, managed, and disposed of in accordance with measures described in ED Section 3.3.5, *Hazardous Waste/Materials*, including Standard Measures **HW-1** through **HW-4,** which would minimize potential impacts to human health and the environment due to accidental release of hazardous materials. To further lessen the potential impact of accidental release of hazardous materials, project-specific Measure **AMM-HW-5** would be implemented, which includes additional measures related to handling treated wood waste, including health and safety plan development and training.

4. For a discussion of rehabilitation, see Response 1 above.

5.83 SHARON MEYER

From: Sharon Meyer
To: albionbridge@DOT
Subject: Patiently waiting
Date: Wednesday, September 11, 2024 6:51:49 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

I'm so looking forward to the new Albion Bridge. Every time I drive across it I worry. We desperately need a new one.
Thank you
Sharon Meyer
Sent from my iPhone

Response to Sharon Meyer

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative.

5.84 STEPHEN BARLOW

From: Stephen Barlow
To: albionbridge@DOT; Tavares, Tony F@DOT
Cc: District 1 PIO@DOT; Caltrans Legislative Affairs@DOT; assemblymember.wood@assembly.ca.gov
Subject: Albion Highway 1 Bridge.
Date: Wednesday, September 4, 2024 5:45:28 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1 Dear Caltrans, as a taxpayer and resident of the Albion 95410 area. I again would like to share my thoughts on this project. I am opposed to this project.

Point 1 CalTrans is funded by the state through different taxation instruments, paid by the motorists in large and these funds are like money for candy with a child. At this time, most families are having to take measures to save money and not spend it. This is not the case with CalTrans.

2 Point 2 These, so called upgrades, are not necessary to the majority of Residents of this area. They are created to increase the value of outside tourism, that most of us don't see a nickel of the money spent here. Even the construction jobs are mostly filled with workers for large contractors, from the greater bay area and as far away as Texas and the deep south. They make pretty good wages, but that money is also exported away from our area.

3 Point 3 The Albion Bridge was deemed as having good structural integrity, but now Caltrans has let the maintenance go and we are now getting to a stage where they will use that fact as a reason to replace. This borders on criminality.

4 Point 4 It seems that Caltrans cherry picks projects that offer travel, per diem compensation and pleasant work conditions. There are many more urgent potential projects in the urban areas of California, where logistics are more difficult and safety is more compromised than here in Mendocino county. One that always comes to mind for me is the Highway 4 corridor between Marsh Creek road and Stockton. There are plenty of places to put the money.

5 Point 5 The replacement of this bridge will disrupt many people's lives, compromising access to the basic necessities that must be procured from Fort Bragg, on a regular basis, for people who live here, not the tourists.

6 Point 6 The approval of these projects smacks of pork barrel politics. Who actually benefits from these actions? Seems like this is Socialism for the Privileged few.

Thank you for taking time to read my thoughts

Respectfully,

--

Stephen Barlow
PO Box 489
Albion, Ca. 95410
707-937-4830

Response to Stephen Barlow

1. We note your opposition to the proposed project.
2. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge.

   The structural deficiencies of the existing bridge include a substandard live load carrying capacity, non-compliant bridge safety rails, and a steel deck truss that lacks redundancy in its design and would be incapable of carrying loads across the bridge if damage occurred at one or more of its steel members (i.e., is fracture critical). These deficiencies cannot be addressed through routine bridge maintenance. For additional details, see Section 1.4, *Purpose and Need,* of the environmental document (ED).

   FHWA regulations prohibit local hiring practices or preferences. However, it is anticipated that the workforce could include local Mendocino County residents.
3. Comment noted.
4. The ED acknowledges that a safe and reliable bridge over the Albion River is vital to the north and south sides of the community of Albion for residents, regional users of SR 1, and tourists on the Mendocino Coast. The purpose of the proposed project is to provide a safe and reliable structure; the new bridge would have an anticipated service life of 75 years.
5. During construction, work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).
6. Comment noted.

5.85 SUSAN WATERFALL

From: Susan Waterfall
To: albionbridge@DOT
Subject: Albion Bridge Replacement
Date: Wednesday, September 4, 2024 5:59:57 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

The people here in Albion, and on the Mendocino coast, have spent at least a decade sincerely trying to understand what would be the best solution for a bridge over the Albion River. We have attended endless meetings, engaged and listened to numerous experts, written letters, and signed petitions. We are reasonable people, and no one wants an unsafe bridge. Over the years there have been many experts who reported that the current wooden bridge, with proper care, remains a completely viable solution. No one has been able to directly refute this claim, or to suggest there is some nefarious motive in trying to keep the current bridge. Now Caltrans is unilaterally moving forward to replacement and again feigning interest in the community's reaction. Our lives here are going to be negatively impacted for years, and an appalling amount of money spent, so that there can be a generic speedway through Albion. I know of no other instance of such a useless waste of money, and such destruction of natural and historic beauty.

2

I hope that Caltrans will somehow consider a more creative, humane, and cost-effective option.

Susan Waterfall
Pianist
Associate Artistic Director, Mendocino Music Festival
510-254-1695

Response to Susan Waterfall

1. The proposed project is needed to address the functional, safety, and structural deficiencies of the existing bridge. The No-Build Alternative and rehabilitation options fail to address the project need. As stated in Appendix I, *Consideration of Rehabilitation Alternative*, FHWA summarized the need for bridge replacement in its 2021 Bridge Inspection Program Annual Review as it "is evident that Caltrans has been prudent at keeping this bridge in service beyond its expected years. It will require more resources to inspect, repair, and eventually reduce the level of serving the transportation needs of SR 1. All the reasons for the replacement of this bridge is at hand and the need to quickly replace this high-risk structure on this important coastal route is prudent".

   Early and continuing coordination with the general public and regulatory agencies is an essential part of the environmental process. See Chapter 5, *Comments and Coordination*, which summarizes the results of Caltrans' efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

2. We acknowledge your support for a creative, humane, and cost-effective option. The identified preferred alternative is Design Option 2B (East Arch), which was found to be the environmentally superior alternative and involves a spandrel arch that will for allow expansive views beyond the bridge.

5.86 SPIRIT

From: Spirit
To: albionbridge@DOT
Subject: Albion bridge
Date: Thursday, September 5, 2024 6:44:17 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

1

Needs to be saved!!! Not destroyed.
And the horrendous impact to life and our quality of life devastating with bridge destruction.

Save historic albion bridge!!

Response to Spirit

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in the environmental document in Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

5.87 TAMMY AND GLADYS BRANSFORD

From: t Bransford
To: albionbridge@DOT
Subject: ALBION BRIDGE PROPOSAL
Date: Monday, September 9, 2024 2:28:50 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Responsible Parties:

1

I object to the proposed reconstruction of the ALBION BRIDGE FOR THE FOLLOWING REASONS:

2

My main Reason is lack of consideration for the safety of residents, taxpayers, wildlife and environment during the duration of this project. Please read the following:

Our volunteer Albion-Little River Fire Department ability to fight fires and get to other emergencies will be COPROMISED during the time Caltrans does this project.

!) The layout of the two stations is separated by the bridge. The one in Little River and main fire station in Albion.

2) The fire department is made up of volunteers, who will have difficulty getting to the equipment if there is an obstruction (i.e. bridge construction).

3) This does not even consider what delays it would mean to the other volunteer fire departments, such as Mendocino or Fort Bragg. Granted, I am not sure where our local CALFIRE stations are, but I assume that they would encounter the same delays.

4) Paramedics, Sherriff and CHP personnel would also have difficulty getting to emergencies on either side of the bridge site.

I bring up this distinct threat to the community's ability to fight fires, because minutes of delay can result in out right catastrophe. We have had

numerous small fires, that could have easily gotten out of hand in. We have
many parks that border campgrounds, resorts and individual residences - all
places where an accidental fire could start. Many these areas are suffering
from massive plant die-off, especially trees. PG&E's lines are another real
risk.

That is just the threat of a fire emergency. Flooding may be a greater risk
this year. Living in an senior community, has made me aware how vulnerable
everyone is in a medical emergency where the emergency room is so far away and
time is of the essence - in the best situation. Near-Drownings and drownings
at Van Dam and other beaches here is not unusual happening.

My main point that this project could put the lives of residence and tourist
at grave risk by obstructing an already congested road for emergency services.
This is definitely the wrong time to do any reconstruction of the bridge.

3 2) The proposed contractor has shown blatant disregard for the land and people in their other project just north of the village of Mendocino. The flooded roadway that was caused by their slash clear cutting technique was just one of the many ways of showing their disregard for the safety of both residents and tourist.

4 3) The closures will be damaging to the many tourist businesses that residents depend on for jobs.

5 The meetings have been well attended, even overflowing but yet CALTRANS will not allow enough time for questions and answers by people, who very lives are going to be drastically impacted by this proposed project. If some natural disaster strikes during

this project, I hope that CALTRANS officials will be held liable to fullest extent of the law.

You are playing with people's lives here, not just a bridge.
Sincerely,
Tammy Bransford &
Gladys Bransford
The Woods
43300 Little River Airport Rd.
Little River CA 95456

Response to Tammy and Gladys Bransford

1. We note your opposition to the proposed project.
2. A comprehensive environmental analysis for the proposed project was completed, which considered the local community, biological resources, and the surrounding environment.

   Further, the proposed project incorporates the use of fire-resistant materials (i.e., concrete and steel) and incorporates a defensible space on either side of the bridge including a clear recovery zone with strict limitations on vegetation. The proposed project involves widening the bridge lanes and shoulders and providing a separated pedestrian walkway, which would better accommodate emergency evacuation along SR 1 in the event of a wildfire. Following fire events, burned areas are more susceptible to erosion and landslides. The proposed project would result in a bridge that is more resilient to debris loading following wildfire events, as it involves fewer piers/foundations, is positioned to minimize encroachment on the floodplain, and includes more structurally resilient materials than the existing bridge.

   Equipment or materials staging within the temporary construction easement located on the fire station parcel would not interfere with the ability of fire fighters to respond to emergency calls. The environmental document (ED) identifies that the impact to public services (including fire protection) and wildfire is a less-than-significant impact under CEQA.

   Emergency response agencies would be notified of the proposed project construction period and would have access to SR 1 throughout construction (Standard Measure **UE-1**). Further, a contingency plan would be prepared in coordination with emergency services to accommodate emergency vehicles across the bridge at all times (**AMM-TT-1**). The project would not substantially affect emergency response services and evacuation routes. For additional detail regarding emergency services, see Master Response 7 (Traffic and Emergency Response).
3. Comment noted.
4. Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Response 7 (Traffic and Emergency Response).

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers

required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

5. To ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period.

5.88 TOM WODETZKI

Note: Two email comments were received from Tom Wodetzki. However, the two emails contained the same content, other than the title. Therefore, only one comment letter is contained here for brevity.

From: Tom Wodetzki
To: albionbridge@DOT
Subject: Public Comment on Community Impact and Preservation of the Historic Albion River Bridge
Date: Sunday, September 1, 2024 9:18:03 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Ms. Liza Walker,

1

As an Albion tourist facility owner, I can attest to the importance of historic sites in attracting visitors from around the nation and world to the Mendocino Coast. The Victorian architecture that has been preserved in Mendocino village is a huge draw, as is the historic Skunk Train in Fort Bragg. Without them our area would be much less visited and our economy less robust.

The historic Albion River Bridge is the third major coastal historic attraction on the Mendocino Coast, because it's the last wood and trestle state highway bridge in all of California, and maybe in the west, and because it is a beautiful bridge and unique marvel of engineering design. If Caltrans demolishes it, a chunk of our logging days history will vanish and the area's economy and the livelihood of many locals will be greatly diminished.

2

To avoid this disaster, I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigatable impacts on the natural and human environment. Preservation would minimize community disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area.

Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).

Sincerely, Tom Wodetzki, Quiet Meadow Cottage, Albion

Response to Tom Wodetzki

1. We note your preference for rehabilitation of the bridge. Rehabilitation was considered but eliminated from further discussion for failure to meet most of the basic project objectives as described in environmental document (ED) Section 2.5.6, *Alternative 4 (Rehabilitation Alternative)*, and Appendix I, *Consideration of Rehabilitation Alternative*. For additional detail regarding bridge rehabilitation, see Master Response 1 (Rehabilitation).

   The proposed project could temporarily reduce regional tourism and cause short-term economic impacts in the Albion community; however, construction of the proposed project would generate direct and indirect temporary economic activity, including the purchases of goods and services and employment of workers required for construction. For additional details regarding economic impacts, see Master Response 6 (Local Economy).

2. A comprehensive environmental analysis for the proposed project was completed. The ED identifies potentially significant impacts to aesthetics, biological resources, and cultural resources. With implementation of mitigation, impacts to biological resources would be reduced to a less-than-significant level, while impacts to aesthetics and cultural resources would remain significant-and-unavoidable under CEQA. See ED Chapter 4, *California Environmental Quality Act (CEQA),* for additional information on significance calls.

   The Build Alternatives are consistent with Coastal Act Policy 30251 and LCP Coastal Element 3.8-6 and other Policies stated in Table 9 in ED Section 3.2.2, *Consistency with State, Regional, and Local Plans and Programs.*

5.89 WENDY MEYER

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Albion River Bridge Project
Public Meeting – August 13, 2024

Name (please print) Wendy Meyer E-mail/Phone# 916-429-5049 Wendy@albionfire.com

Address (home) City State Zip Code

Authorized Representative (name of organization or agency) Albion Little River Fire Protection District
P.O. Box 634, Albion CA 95410

Address (business) City State Zip Code

1 COMMENTS Need to be looped in to info on staging. Potential conflict with Fire Dept. building/permitting process + CalTrans staging.

Written comments may be mailed to Caltrans, Attention: Liza Walker, Office of Environmental Management, 1656 Union Street, Eureka, CA 95501 or emailed to albionbridge@dot.ca.gov. All comments must be sent by September 9, 2024.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Response to Wendy Meyer

1. Caltrans is coordinating with the Albion-Little River Fire Protection District (ALRFPD) regarding planned construction of a new fire station at 33900 West Street in Albion to ensure that use and acquisition of the property would not substantially interfere with the fire station.

   Pending right of way negotiations with the ALRFPD, use of the fire station parcel for temporary construction staging would occur. Equipment or materials staging within the temporary construction easement located on the fire station parcel would not interfere with the ability of fire fighters to respond to emergency calls (**AMM-UE-1)**. Further, a portion of the ALRFPD property adjacent to SR 1 is identified as potential right of way for the preferred alternative alignment.

5.90 WINSTON BOWEN

From: WINSTON BOWEN
To: albionbridge@DOT
Subject: Bridge replacement
Date: Saturday, August 31, 2024 12:57:09 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

I found this on a website provided by the Albion Rver Bridge Stewards, and hope it is the Caltrans address for public comments.

1 I support replacing the bridge, unlike the Stewards. It is unsafe to drive and expensive to maintain. It does not come close to meeting current standards in many areas.

2 Like all residents, I am concerned about the length of time construction will take. Caltrans provides a poor example of its ability to manage projects such that they minimize traffic disruption. I cite as an example the Jack Peters Bridge project, where parked motorists waiting for a light to change observe idle equipment, very few workers and little apparent progress. Your work on the Jack Peters Bridge replacement is an advertisement to residents in this area of what is to come with future projects, and it is not the kind of publicity you should want. I suspect if you prove you can do better, some critics (not all, to be sure) will come to your point of view.

3 Finally, I do not wish to see a repetition of the Willits Bypass project, where the project was finally completed, but at a far greater cost than would have been the case if local opposition had not been so vehement. A fortune was wasted and nothing changed.

Winston Bowen
From downtown Caspar

Response to Winston Bowen

1. We note your support for bridge replacement to address safety concerns associated with the existing bridge.

   After consideration of public and agency comments, Design Option 2B (East Arch) has been identified as the preferred alternative. Design Option 2B is anticipated to take three years to construct.

2. Traffic control for the proposed project is standard and would involve flagging or a temporary signal system. Work would be scheduled and conducted to avoid unnecessary inconvenience to the public and to maintain access to driveways, houses, and buildings within the work zones (Standard Measure **TT-2**). The proposed project would also provide notification to the public and applicable agencies with information regarding construction activities and planned closures (Standard Measure **TT-3** and **AMM-PR-1**). For additional detail regarding traffic impacts, see Master Responses 7 (Traffic and Emergency Response).

3. Comment noted.

Chapter 6. Template Letter Comments

6.1 INTRODUCTION

Many comments received on the Albion River Bridge Project Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) were in the form of template letters. There were ten separate template letters, including for air quality, biological resources, business impacts, community impacts, energy efficiency, environmental disruption, hydraulic and floodplain impacts, noise impacts, daily commute disruptions, and traffic disruption.

Template letters and responses are provided in Section 6.2 below, *Template Comments and Responses*. While there was variation in the text in some of the letters, most largely reflected the original templates, and did not raise new information or other substantive comments (see Section 1.5 of this document, *Responses to Comments Under CEQA and NEPA*, for more information on responses to comments). Therefore, template comments and responses have been grouped together, with the individuals making the comments noted. Those whose comments varied to a greater degree were called out separately, and those whose comments were more customized were included in Chapter 5, *Individual Comments.* See Section 1.3 of this document, *Index of Commentors,* for a list of all that commented on the document, and where the responses to their comments are found. In addition, if an individual submitted a template letter on the same topic more than once, the number of times submitted are included in parentheses after their names.

Many comment responses refer to master responses; these can be found in Chapter 2 of this document, *General Comments/Master Responses.*

6.2 Template Comments and Responses

6.2.1. AIR QUALITY

Commentor(s)	Comment	Response
Diane Clouse; Dobby Sommer; Ellen Athens; Leslie Hubbert; Mary Hooper; Richard; Rick Hemmings	I am writing to express concerns about the air quality impacts of the Albion River Bridge Replacement Project. The Air Quality Report highlights that construction activities will contribute to local air pollution through pollutant and dust emissions from heavy-duty equipment to the narrow lower Albion River Valley (Air Quality Report, p. 25-28). To mitigate these environmental impacts, I recommend that the project team consider rehabilitating the existing historic Albion River Bridge rather than building a new structure. Rehabilitation would result in substantially fewer emissions and a smaller environmental footprint compared to the construction of a new bridge. This approach would also allow the community to retain an important historical landmark while addressing the necessary safety improvements in a more sustainable manner. Thank you for considering this environmentally responsible alternative.	See Master Response 9 (Air Quality) for details regarding air quality impacts during construction, and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation impacts.
Melissa Hays	If you take the time to measure at air quality, the Mendocino Coast has some of the best air quality anywhere. When you measure air quality, 0 indicates perfect air. If you look at the air quality in Albion California, we are somewhere between 9 to 20. People come from everywhere to breathe our air and to see our ocean because it is so beautiful and the clean air contributes to this beauty. As a 50 year resident I am writing to express concerns about the air quality impacts of the Albion River Bridge Replacement Project. The Air Quality Report highlights that construction activities will contribute to local air pollution through pollutant and dust emissions from heavy-duty equipment to the narrow lower Albion River Valley (Air Quality Report, p. 25-28). To mitigate these environmental impacts, I recommend that the project team consider rehabilitating the existing historic Albion River Bridge rather than building a new structure. Rehabilitation would result in substantially fewer emissions and a smaller environmental footprint compared to the construction of a new bridge. This approach would also allow the community to retain an important historical landmark while addressing the necessary safety improvements in a more sustainable manner. Thank you for considering this environmentally responsible alternative.	See Master Response 9 (Air Quality) for details regarding air quality impacts during construction, and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation impacts.

6.2.2. Biological Resources

Commentor(s)	Comment	Response
Carmen Goodyear; Diane Clouse; Dobby Sommer; Donna Farmer; Elan Stopnitzky; Elizabeth Canady; FFT; Glyn Rixon; Jenny Harrison; Julie Drucker; Karl Schoen; Laura Scott; Leslie Hubbert; Lynn Louderback; Mary Hooper; Melissa Hays; Richard; Rick Hemmings; Rita Crane (2x); Susan Maeder; Yaniv Stopnitzky	I am writing to raise strong concerns about the potential disruption to biological resources, including the sensitive eelgrass habitats, as a result of the Albion River Bridge Replacement Project. Eelgrass beds play a critical role in the coastal ecosystem, providing habitat for various marine species and contributing to water quality. The construction of a new bridge could significantly disturb these habitats and other biological resources in the area (Draft Final Hydraulic Report, p. 3-4). To protect these vital resources, I recommend that the project team pursue the rehabilitation and preservation of the existing historic Albion River Bridge. Rehabilitation will have a much lower impact on the surrounding environment, including the eelgrass beds, by avoiding the extensive in-water work required for a new structure. Preserving the existing bridge also aligns with environmental stewardship and the protection of Mendocino County's unique coastal ecosystems. Thank you for considering this environmentally conscious alternative.	The referenced pages of the Draft Final Hydraulic Report discuss project watershed conditions, flood discharges, design objectives, and modeling approaches and methodologies, rather than impacts to biological resources. A discussion of biological resources and project impacts to the resources such as eelgrass are discussed in the Natural Environment Study prepared for the project. See Master Response 13 (Environment) for a response regarding evaluation of biological resources and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation.

6.2.3. BUSINESS IMPACT

Commentor(s)	Comment	Response
Diane Tobias; Harriet Bye; Julie Drucker; Melissa Hays; Nancy Chao; Rick Hemmings; Rita Crane	I am writing as a local business owner who is deeply concerned about the potential impact of the Albion River Bridge Replacement Project “build alternatives” on my business and its customers. The construction of a new bridge would undoubtedly lead to significant disruptions in traffic flow, detours, and access issues that would severely affect my business operations and my customers’ ability to reach my establishment. The Community Impact Assessment has highlighted that construction could restrict access to key areas, including local businesses, for an extended period that by further analysis of the Draft EIR/EIS and its attachments will extend to 4 to 6 years (Community Impact Assessment, p. 14-17). This disruption would result in a decrease in customer traffic, loss of revenue, and long-term harm to the local economy, which relies heavily on both residents and tourists who travel across the Albion River Bridge. Instead of pursuing a new bridge, I urge the project team to focus on rehabilitating and maintaining the existing historic Albion River Bridge. Rehabilitation would be less disruptive, allowing for phased construction that maintains traffic flow and business access. By preserving the existing bridge, we can protect not only its historical value but also the economic vitality of local businesses that depend on it. Thank you for considering the serious impact that bridge construction could have on local businesses like mine. I strongly encourage you to prioritize the rehabilitation of the existing Albion River Bridge as a solution that supports both the community and its economy.	See Master Response 7 (Traffic and Emergency Response) for a response on traffic during construction, Master Response 2 (Construction Duration) for the project schedule, Master Response 6 (Local Economy) for economic impacts on the community, and Master Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts.

6.2.4. COMMUNITY IMPACTS

Commentor(s)	Comment	Response
Amanda de Smidt (2); Anita Bedenis; Anne Eaton-Kemp; Arlene Reiss; Bonnie Bills; Brian and Gretchen Paddock; Cherie Christiansen; Chris Bolei; Chris Larsen; Christine Berchen; Christopher Steinrueck; Dale Canyon; David Spampanato; Denise Doering and Robert Hudson; Diane Buxton; Diane Clouse; Dobby Sommer (2x); Donna Farmer; Dorie and David Rivers; Eleanor Cooney; Elizabeth Canady; Ellen Athens; Ellen Saxe; Erica Fielder; Felicia Rice; Fern Kruger; Gary Ratway; Ginny Stearns; Hilary Eddy; Ilana Williams; Jerry Brown; Julie Drucker; Karl Schoen; Kat Hanlon; Larry Miller; Leslie Hubbert; Lisa D Walker; Lynn Louderback; Lynne Paschal; Marci Eversole; Margaret Pickens; Mary Hooper; Melissa Hays; Michael Coad; Miranda Edison; Nancy Chao; Nancy Reynolds; Norma Leah Andres; Patricia Scott; Pete Kalvass; Rachel Ganapoler; Richard; Rick Hemmings; Rita Crane (2x); Rona L Peckich; Rosalie Anchordoguy; Rosemary Jacobs; Sam Gitchel; Sara Fowler (2x); Stan Thornton; Susan Waterfall; Thomas Herz; Virginia Sharkey; Windy and Grant Lineham; Zattu Kadan	I am writing to address the significant, unmitigated community impact of the Albion River Bridge Replacement Project. The Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17). I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigated impacts on the natural and human environment. Preservation would minimize community disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area. Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).	See Master Response 5 (Public Access During Construction) for details on public access during construction, Master Response 13 (Environment) regarding environmental impacts, Master Response 6 (Local Economy) regarding economic impacts, Master Response 3 (Coastal Act Policies) for information on CCA and LCP policies, and Master Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts. See also ED Chapter 4, California Environmental Quality Act (CEQA) Evaluation, for an evaluation of impacts to the environment under CEQA and ways proposed to mitigate potentially significant effects.

Commentor(s)	Comment	Response
Alexandra Allman-Van Zee	I am writing as a long time resident of the area (and someone who loves the unparalleled history wrapped up in our nationally and state registered historic bridge) to address the significant, and sadly, unmitigated community impact of the Albion River Bridge Replacement Project. The Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17). The Replacement project will also do irreparable harm to the coastal environment. I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and still unmitigated impacts on the natural and human environment. Preservation would minimize community disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area. Caltrans has now refused to include Rehabilitation and Repair as an option and would not allow residents to comment at their disastrous community meeting. By filling the time with often needless charts and long-winded explanations, they essentially ran out the clock on public comments. They also refused to extend the meeting to allow for the 30-odd people with their hands still raised. It's not the first time they've cut the community off at such events. We are a rural community that has the great good fortune of living on such a raw and scenic coast. Often times, it feels as if the "powers that be" don't listen, much less, WANT to listen to us because we are small and rural and have a lot less money than wealthier parts of our state's beautiful coast. I can assure you that, though we may be small, we are no less committed to preserving the unique nature of our communities and our historic infrastructure. Caltrans has run rough shod over us long enough… their (unnecessary) replacement of the Jack Peters Creek bridge just north of Mendocino is just one example of a stunningly tone deaf "make work" project that has utterly failed our coast and our coastal communities.	See Master Response 5 (Public Access During Construction) for details on public access during construction, Master Response 13 (Environment) regarding environmental impacts, Master Response 6 (Local Economy) regarding economic impacts, Master Response 3 (Coastal Act Policies) for information on CCA and LCP policies, and Master Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts. See also ED Chapter 4, California Environmental Quality Act (CEQA) Evaluation, for an evaluation of impacts to the environment under CEQA and proposed ways to mitigate potentially significant effects. To ensure that the public had adequate opportunity to comment, two public meetings were conducted – one in person and one virtual. Also, multiple avenues were offered for submitting comments, including by postal mail and by e-mail. Further, an extended public comment period was provided, which included an initial 60-day period and an additional 30-day period. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and

Commentor(s)	Comment	Response
	Let's not let Caltrans do that with the Albion River Bridge. Two of the world's leading experts in timber trestle automobile bridges have examined the bridge and determined it's remarkable strength and sturdiness despite years of targeted neglect by Caltrans (info on their findings can be found at the Albion Bridge Stewards website at savehighway1.org). Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).	substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.
Bill Cornelius	To test 15 yr olds manhood, crossing the bridge catwalk has been part of a local rite of passage for 70 yrs. Please note that no one has ever fallen. There have been attempts to block access for the "protection" of generations of dirtbike crazies, but all have failed. It symbolizes proof of will for many boomers, a connection to tradition, community, and Albion identity. I know this is a trifle for state contractors to consider, but they too have addressed what it takes to become who they are. Some actions access potential, some block it. A new bridge would actually be bad for the community. Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).	See Master Response 3 (Coastal Act Policies) for information on CCA and LCP policies, and Master Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts.
Karen Lewis	I am writing to address the significant, unmitigated community impact of the Albion River Bridge Replacement Project. The Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17). I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigated impacts on the natural and human environment. Preservation would minimize community	See Master Response 5 (Public Access During Construction) for details on public access during construction, Master Response 13 (Environment) regarding environmental impacts, Master Response 6 (Local Economy) regarding economic impacts, Master Response 3 (Coastal Act Policies) for information on CCA and LCP policies, and Master

Commentor(s)	Comment	Response
	disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area. Several engineers have prepared studies showing that the existing historic wooden bridge is structurally sound. In other regions, if there is a narrow bridge, there's a system where pedestrians and cyclists can push a button to activate flashing lights to evidence "pedestrian or cyclist on the bridge" so that motorists are aware. This increases safety. A wider bridge is NOT needed in this location. Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting). I have been a volunteer Beach Surveyor with the Noyo Center for Marine Science for the past several years and as such, can attest that this is a very fragile and important estuary and the proposed construction will be detrimental to fish, wildlife, avian, aquatic species and vegetation. Including nesting habitat for seabirds and kelp habitat.	Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts. See also ED Chapter 4, California Environmental Quality Act (CEQA) Evaluation, for an evaluation of impacts to the environment under CEQA and proposed ways to mitigate potentially significant effects. The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics.
Laurie York	The tall grasses along the highway and up Albion Ridge Road have not been mowed this summer along the roadside and pose a serious fire hazard. We have potholes all over the county which put drivers at risk because holes in the roads haven't been maintained. We have a bridge in place that has been deemed sound and viable by highly qualified Bay Area engineers and yet you want to spend huge amounts of money to replace our historical and functional bridge. It seems as if you are taking advantage of available federal infrastructure money and neglecting local services that we depend upon for our community's safety. Questions at local meetings go unanswered and your agency doesn't appear to be listening to local	The ED extensively describes the condition of the existing bridge and incorporates the 2021 and 2022 bridge inspection reports, both of which rate the superstructure and substructure condition as 4-Poor. Caltrans bridge inspections and reporting are conducted in accordance with 23 CFR 650 Subpart C (National Bridge Inspection Standards). Further, the

Commentor(s)	Comment	Response
	concerns. Nonetheless, I write you hoping that you somehow hear what our community has to say. I am writing to address the significant, unmitigated community impact of the Albion River Bridge Replacement Project. The Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17). I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigated impacts on the natural and human environment. Preservation would minimize community disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area. Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).	FHWA performs annual audits of the bridge inventory, inspections, and reporting to ensure compliance with bridge inspection metrics. Comments received on the Draft ED have been responded to in this Final ED. See Master Response 5 (Public Access During Construction) for details on public access during construction, Master Response 13 (Environment) regarding environmental impacts, Master Response 6 (Local Economy) regarding economic impacts, Master Response 3 (Coastal Act Policies) for information on CCA and LCP policies, and Master Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts. See also ED Chapter 4, California Environmental Quality Act (CEQA) Evaluation, for an evaluation of impacts to the environment under CEQA and ways to mitigate potentially significant effects.
Vince Taylor	My first request is for you to create a new (or supplemental) (DEIR/DEIS) and Draft Section 4(f) Evaluation have it produced for public review and comment. The existing one is woefully inadequate. Secondly I am writing to address the significant, unmitigated community impact of the Albion River Bridge Replacement Project. The Community Impact Assessment notes that the project will severely disrupt access to the Albion River Campground and	See Master Response 5 (Public Access During Construction) for details on public access during construction, Master Response 13 (Environment) regarding environmental impacts, Master Response 6 (Local Economy) regarding economic impacts,

Commentor(s)	Comment	Response
	Marina, as well as limit public access to Albion Cove Beach during construction (Community Impact Assessment, p. 14-17). I urge the project team to consider rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge that has significant and unmitigated impacts on the natural and human environment. Preservation would minimize community disruption, protect local businesses, and maintain access to recreational areas that are vital to the local economy. Moreover, the existing bridge holds significant historical value, and its preservation would enhance the cultural heritage of the area. Please prioritize the rehabilitation of the existing bridge as a more community-friendly and historically respectful alternative (that is also the only Coastal Act- and LCP-consistent alternative by avoiding intrusion of new looming development in the designated and mapped highly scenic area, where new development has to be subordinate to the setting).	Master Response 3 (Coastal Act Policies) for information on CCA and LCP policies, and Master Response 1 (Rehabilitation) for information related to bridge rehabilitation impacts. See also ED Chapter 4, California Environmental Quality Act (CEQA) Evaluation, for an evaluation of impacts to the environment under CEQA and proposed ways to mitigate potentially significant effects. A final EIR/EIS has been prepared pursuant to CEQA and NEPA.

6.2.5. Energy Efficiency

Commentor(s)	Comment	Response
Diane Clouse, Dobby Sommer (2x); Ellen Athens; Hannah-Leigh Bull; Karl Schoen; Laura Scott (2x); Leslie Hubbert; Melissa Hays; Myra Beals; Richard; Rick Hemmings; Rita Crane; Warren De Smidt; Woodson Thornton	I am submitting my comments on the energy efficiency aspects of the Albion River Bridge Replacement Project alternatives. The Energy Analysis Memorandum discusses the significant energy consumption required for constructing a new concrete bridge (Energy Analysis Memorandum, p. 3-5). The Project alternatives (the DEIR/DEIS erroneously presents no proposed project for relevant specific analysis) also do no describe and analyze the extent to which they may increase Vehicle Miles Traveled, either during the 4-6 year total construction/bridge removal phase or during the proposed 75-year service life of a new bridge, notwithstanding that the DEIR/DEIS projects a substantial increase in average daily trips (ADT's) on the bridge. Instead of pursuing an energy-intensive new construction project, I urge the project team to rehabilitate and preserve the existing historic Albion River Bridge. Rehabilitation requires less energy and fewer resources, making it a more sustainable and cost-effective solution. This approach aligns with California's goals of reducing energy consumption, greenhouse gas emissions, and vehicle miles traveled, while preserving an invaluable piece of California history. Please consider this alternative as a more energy-efficient and environmentally friendly option.	See Master Response 11 (Energy) for details on energy use during construction, Master Response 12 (Vehicle Miles Traveled) regarding VMT, Master Response 2 (Project Timeline) for the project schedule, and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation. In regard to evaluation of "no proposed project", the No-Build (No-Action) Alternative is required to be evaluated under NEPA and CEQA.

6.2.6. ENVIRONMENTAL DISRUPTION

Commentor(s)	Comment	Response
Annie Lee; Bruce Blondin; Carrie Durkee; Diane Buxton; Diane Clouse; Diane Ogle; Dobby Sommer; Donna Farmer; Felicia Rice; Frank Letton; Franz Arner; Geoffrey Baugher; Helen Jacobs; James Holden; Jeff Taylor; Julie Drucker; Karen Lewis; Karen Rakofsky; Karl Schoen; Leslie Hubbert; Margot Lieberman; Marilyn Magoffin; Mary Heinrich; Mary Hooper; Marya Vohryzek-Griest; Melissa Hays; Michael Hubbert; Myra Beals; Nancy Chao; P A Asher; Rick Childs; Rick Hemmings; Sally; Sarah Lastition; Sheila Jenkins; Suzanne Miller; Toby Malina; Woodson Thornton	I am writing to express my strong concerns about the broader environmental disruptions that the Albion River Bridge Replacement Project in its several “build alternatives” may likely cause. Constructing a new bridge could lead to significant habitat loss (including through shading by the substantially wider new bridge design), soil erosion, and water pollution, all of which would have lasting impacts on the local environment and wildlife (Draft Final Hydraulic Report, p. 9-10). In contrast, rehabilitating and preserving the existing historic Albion River Bridge would greatly reduce the environmental footprint of the project. Rehabilitation requires fewer resources and less invasive construction methods, which would help protect the natural landscape and the species that depend on it. Moreover, preserving the existing bridge would honor its historical and cultural significance with less ecological impact. I urge the project team to prioritize the rehabilitation of the existing bridge as a sustainable and environmentally responsible alternative. Thank you for your attention to this important issue.	The referenced pages of the Draft Final Hydraulic Report discuss hydraulic modeling results rather than impacts from habitat loss, soil erosion, or soil pollution. See Master Response 13 (Environment) for a response regarding evaluation of environmental resources and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation.

6.2.7. HYDRAULIC AND FLOODPLAIN IMPACT

Commentor(s)	Comment	Response
Cheryl Bloom; Diane Clouse; Dobby Sommer; Felicia Rice; Janferie Stone; Kelly Steinrueck; Leslie Hubbert; Mary Hooper; Melissa Hays; Merry Winslow; Richard; Rick Hemmings; Rita Crane	I am writing to comment on the hydraulic and floodplain considerations of the Albion River Bridge Replacement Project. The Draft Final Hydraulic Report outlines potential changes to floodplain dynamics due to the construction of alternative new bridge alignments (Draft Final Hydraulic Report, p. 4-10). Rather than building a new bridge structure, which during construction will and thereafter will likely alter the natural flow of the wild and scenic Albion River, I recommend rehabilitating the existing historic Albion River Bridge. Preservation would maintain the current hydraulic balance and minimize environmental disruption of this important California river and its Albion Flat gravel (hyporheic) bar, on which juvenile salmon rely for substance before migrating into the Pacific Ocean. This approach also honors the bridge's historical significance and avoids the ecological impact of new construction in a sensitive area. Thank you for considering the historic Albion River Bridge preservation alternative, which offers both significant environmental and cultural benefits, while it avoids the many direct and cumulative adverse effects on the natural and human environments of the "build alternatives".	See Master Response 8 (Hydrology and Floodplain) for information on project impacts to hydrology and the floodplain and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation impacts.

6.2.8. NOISE IMPACT

Commentor(s)	Comment	Response
Alice Einhorn; Diane Clouse; Dobby Sommer (2x); Elizabeth Canady; Ellen Athens; Julie Drucker; Laura Scott (3x); Leslie Hubbert; Mary Hooper; Melissa Hays; Richard; Rick Hemmings; Rita Crane; Shelley Martin; Spirit	I am writing to express my concerns regarding the significant, unmitigated noise impact associated with the proposed Albion River Bridge Replacement Project. The Noise Study Report indicates that construction activities will produce significant noise levels, potentially disturbing residents and visitors as well as avian, terrestrial, and aquatic wildlife (Noise Study Report, p. 20-24). Instead of moving forward with a noisy and disruptive construction process for a new bridge, I strongly recommend rehabilitating and preserving the existing historic Albion River Bridge. This approach would not only substantially reduce noise pollution but also preserve an important historical structure that is listed on the National Register of Historic Places. Rehabilitation would be less intrusive and environmentally damaging, and it honors the bridge's cultural significance. Thank you for considering this alternative approach.	The referenced pages of the Noise Study Report (NSR) identify the existing noise environment and summarize the results of short-term and long-term noise measurements taken from locations surrounding the project (p. 20 – 22) and identify the predicted future noise environment following construction (p. 23 – 24). The referenced pages of the NSR do not contain predicted noise levels during construction. If the comment intended to reference pages 30 – 34 of the NSR (Chapter 8 – Construction Noise), this chapter includes a worst-case assessment of potential noise impacts during construction. The NSR and the ED identify that the loudest noise-generating construction activity, pile driving, would generate an anticipated maximum outdoor noise level of 94 dBA Lmax at residences approximately 115 feet from impact pile driving. However, pile driving would only be required for specific activities, such as construction of temporary trestles and new bridge foundations and would occur during daytime hours over short durations with breaks in between each pile. Pile driving would not be ongoing throughout the length of construction. In addition, the project would implement minimization measures to reduce noise impacts, including providing acoustic shielding around pile driving hammers and implementing additional noise controls when operating outside typical hours (see **AMM-NOI-1**). See Master Response 10 (Noise) for details on noise during construction and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation impacts. See also relevant sections in ED Section 3.4, *Biological Resources,* for a discussion of project impacts to special status species, including from airborne and hydroacoustic noise, and Section 4.3.4, *Biological Resources,* for a discussion of the level of impacts under CEQA. A comprehensive environmental analysis for the proposed project was completed; avoidance, minimization, and/or mitigation measures were included for project impacts.

6.2.9. DAILY COMMUTE DISRUPTIONS

Commentor(s)	Comment	Response
Dobby Sommer (2x); Gary Ratway; Havana Davidson; James Roberts; Janferie Stone; Josie Perla; Laura Scott (2x); Melissa Hays; Michael Ward Seeler; Rick Hemmings; Rita Crane	I am writing as a resident of Mendocino County who routinely travels across the Albion River Bridge to get to and from work. The proposed Albion River Bridge Replacement Project concerns me greatly due to the significant disruptions it would cause to my daily commute and the potential impact on my livelihood and quality of life. The construction of a new bridge would lead to major traffic delays, detours, and extended driving times, which would make it much more difficult for residents like me to maintain our daily routines (like going to work, school, shopping, or other essential functions) and family responsibilities (Initial Site Assessment, p. 2-4). These disruptions could last for 4 to 6 years when the time for existing bridge removal and contingencies is included, creating an ongoing hardship for those of us who depend on the bridge for our livelihoods. Instead of building a new bridge, I strongly urge the project team to focus on rehabilitating and maintaining the existing historic Albion River Bridge. This bridge has served the community well for decades, and with proper maintenance and upgrades, it can continue to do so without causing the severe disruptions that a complete replacement would entail. Rehabilitation would preserve not only the bridge's historical value but also the reliability of our daily travels, ensuring that residents can travel safely and efficiently. Thank you for considering the impact on the local community and the needs of daily commuters like myself in your decision-making process. I hope and request that you will prioritize the rehabilitation of the existing Albion River Bridge as a more practical and less disruptive solution.	The referenced pages of the Initial Site Assessment (ISA) include a project description. The ISA is a document that assesses the potential for hazardous waste contamination and does not provide detail on traffic. However, as noted in the ISA, traffic would be diverted to the new bridge prior to demolition of the existing structure. See Master Response 7 (Traffic and Emergency Response) for details on traffic during construction, Master Response 2 (Construction Duration) for the project schedule, and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation impacts.

6.2.10. TRAFFIC DISRUPTION

Commentor(s)	Comment	Response
Barbara Faulkner; Carmen Goodyear; Christine Berchen; Cynthia Johnson; Diane Clouse; Dobby Sommer; Elizabeth Canady; Ellen Athens; Erif Thunen; Flora Greenberg; Gabe De Smidt; Grant Lineham; Gretchen Schubeck; Joan Burleigh (2x); Karl Schoen; Kristin Otwell; Kymberly Ainsworth; Laura Scott ; Leslie Hubbert; Lynn Learned Sims; Margaret Pickens; Mary Hooper; Melissa Hays; Myra Beals; Pete Kalvass; Priscilla and Larry Krasner; Ray Duff; Rhoda Teplow; Richard; Ricia Araiza; Rick Hemmings; Rita Crane; Sidra Stone; Stan Thornton; Susan Larkin; Susan Nutter; Terry Simcik	I am writing to express my strong concerns about the likely significant traffic disruption caused by the Albion River Bridge Replacement Project's "build alternatives" and removal of the historic, iconic Albion River Bridge. The construction of a new bridge would likely result in significant one-lane and full bridge traffic delays and detours, negatively impacting local residents, businesses, and visitors who rely on State Route 1 for daily travel to work, school, shopping, recreation, public meetings, and church, among other destinations (Initial Site Assessment, p. 2-4). To minimize these unmitigated significant community impacts, I strongly recommend rehabilitating and preserving the existing historic Albion River Bridge instead of constructing a new bridge structure at a cost of over $130 million to over $155 million. Rehabilitation could be done in phases, allowing for continuous traffic flow with fewer disruptions. This approach would reduce the negative effects on the community, coastal businesses, prevent lengthy detours, and preserve the vital connection that the current bridge provides for this part of coastal Mendocino County. Preserving the existing bridge also respects its historical significance, offering a solution that balances both functional needs and cultural heritage. Thank you for considering this more community-friendly alternative.	The referenced pages of the Initial Site Assessment (ISA) include a project description. The ISA is a document that assesses the potential for hazardous waste contamination and does not provide detail on traffic. However, as noted in the ISA, traffic would be diverted to the new bridge prior to demolition of the existing structure. See Master Response 7 (Traffic and Emergency Response) for details on traffic during construction, Master Response 2 (Construction Duration) for the project schedule, and Master Response 1 (Rehabilitation) for information related to impacts of bridge rehabilitation impacts.

6.3 OTHER

The following letter was received from the Albion Bridge Stewards related to public comments received on the Draft EIR/EIS. The letter included over 100 template comment letters previously provided to Caltrans via email. All comments submitted as part of the letter are included and responded to in Section 6.2 above or other appropriate sections, as discussed in Section 6.1, *Introduction.* Full copies of the attached comment letters are not provided due to duplication.

Albion Bridge Stewards
From the bridges to the ridges, working to protect our coast.
P.O. Box 363
Albion, CA 95410

September 6, 2024

Liza Walker, Eureka Office Chief
Caltrans North Regional Environmental
1656 Union Street
Eureka, CA 95501

Dear Ms. Walker:

Please find enclosed hard copy versions of over 100 public comment emails as well as copies of signed petitions urging Caltrans to withdraw the current DIES/DIER and return with one that is not only accurate and complete (which the current one is not) but also addresses the rehabilitation and maintenance of the current historic bridge.

You should have electronic versions of all of the above, too, but we wanted to send hard copy as well.

Please add the enclosed as well as this letter to the public comments file regarding the Albion River Bridge project.

Thank you,

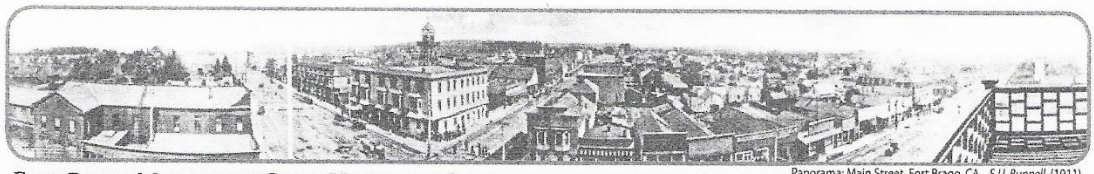
Jim Heid
Albion Bridge Stewards

Website: www.savehighway1.org
Email: acab@mcn.org

Chapter 7. Miscellaneous Public Hearing Handouts

7.1 INTRODUCTION

The following documents were distributed by members of the public during the public meeting held on August 13, 2024. The handouts speak to the historic value of the bridge and support its preservation. The handouts do not raise questions or comments specific to the draft environmental document and thus no response is provided. Further, no attempt to fact-check the information has been performed.



Panorama: Main Street, Fort Bragg, CA. *S.U. Bunnell* (1911)

FORT BRAGG-MENDOCINO COAST HISTORICAL SOCIETY
P. O. Box 71 / Museum: 343 North Main Street
Fort Bragg, California 95437-0071 Hours: vary seasonally. *See* www.fortbragghistory.org Tel. 707-964-4251

27 January 2018

To Whom it May Concern:

The Fort Bragg-Mendocino Coast Historical Society is writing in support of the Albion Bridge Stewards' efforts to preserve the last surviving wooden bridge in the California State Department of Transportation (DOT) system. The DOT has taken very good care of this bridge since its completion in 1944. Although it would not be built exactly the same way today as it was 75 years ago, thus earning the term "obsolete," it remains functionally safe. A structural analysis conducted by an outside expert determined its continuing utility.

Although all the bridges in DOT's system were originally of wood construction, the Albion Bridge is the only example of wooden bridges left in the state highway system. For this reason it attracts a number of engineering students from U.C. Berkeley and other schools to study the engineering problems involved in such projects and their solutions. Having so far withstood 75 years with no signs of serious deterioration, and with continuing good maintenance, it would appear to have proven its structural merits. The wooden bridge also fits into the scale of its landscape setting and serves the real needs for the two-lane road of which it is a part. There is no need for a cement bridge in this location where there will probably never be the traffic volume or weight that would require such a structure.

Since the bridge recently received historical landmark status, it will draw additional attention to the area as an example of a unique road-building structure which can be seen nowhere else in the state, you might say it is our equivalent of the wooden covered bridges back East.

Certainly there must be better uses for the massive monies it would require to replace this historic bridge when its condition makes it unnecessary at this time. Since its current condition does not require such an expensive replacement project, we make a case for its preservation on historical and esthetical grounds.

Thank you for your consideration.

Sylvia E Bartley
FB-MCHS Board Member / Archivist

MENDOCINO COUNTY
HISTORICAL SOCIETY
603 West Perkins Street • Ukiah, California 95482
707-462-6969

Mendocino County Historical Society

March 12, 2018

603 West Perkins Street

Ukiah, Ca 95482

To Whom it May Concern:

The Mendocino County Historical Society at our March board meeting voted in favor of the preservation of the Historic Albion River Bridge. This wooden bridge is of great historic significance and recently received historical landmark status in California and the National Register of Historic Places.

It is our belief that other options must be considered rather than either destruction of this historic landmark or construction of an adjacent structure that would destroy the scenic beauty of our Mendocino coast.

We believe that other options must be available and strongly evaluated in order to maintain and enhance the beauty and viability of our California coast as a scenic and historic destination. I am including a document "The Albion River Bridge: A Short History" as a partial explanation of our support.

Thank you for your consideration.

Dr. Paul W. Poulos

Director, Mendocino County Historical Society

A Story of the Albion River Bridge

The original bridge over the Albion River was a low timber draw bridge. It served as an important element of the "Old Coast Wagon Road" established by Mendocino County along this section of the northern California coastline. During the late nineteenth century, most traffic to and from coastal towns and sawmills was by steamship or from inland rail connections. The drawbridge location routed the minimal coastal traffic through the center of the sawmill operations of the Albion Lumber Company, the first mill to be built on the Northern California coast (1852). It was built by William A. Richardson, the first American to settle in California (1823).

As the amount of wagon and ultimately motorized traffic increased along the coast beyond the capacity of the small draw bridge, a new route was established. An elevated timber trestle bridge was designed and built by Mendocino County in 1922. It was located one half mile up river thus avoiding the disruption caused by the increased traffic in the center of the mill operations. This new location also soon became inadequate to accommodate the ever increasing commercial and industrial traffic along Highway One.

The meandering access roadways to the old bridge and its narrow roadbed required that the Highway Department consider complete replacement rather than major structural alterations. Since all lumber company operations had ceased by 1934, the former mill location was abandoned. A new route, directly across the valley, at the mouth of the river, was established and a new design was prepared in accord with Department of Highways' continuing commitment to the dictates of the "City Beautiful" movement of the early 20th century.

This movement, promoted by Charles Mulford Robinson emphasized that *"a bridge is so conspicuous and monumental a structure that we should not be satisfied merely with durability and strength, but should demand that these be added: fitness, grace, and beauty."* In accord with this movement, the Division of Highways eliminated truss designs for all but exceptionally long span bridges. This commitment to more beautiful designs included a program of new and replacement bridges along California's scenic coastal Highway 1. Timber and steel truss bridge design was set aside and replaced by steel reinforced, poured in place, concrete beams and arches. Concrete was much more readily available in California and the decreased maintenance cost was an attractive consideration, especially along the coast. A premiere example of this effort is the National Register listed Bixby Creek Bridge (1932) at Big Sur, in Monterey County.

In Mendocino County, 2 beautiful concrete arch bridges were built to replace the deteriorated timber trestle bridges at Jug Handle Creek (1938) and Russian Gulch (1940). These bridges are less than 10 miles north of Albion on Highway 1. When the war began, in 1941, the new bridge for Albion was still on the drawing board, and all new bridge work was restricted to "major" California roads. Highway 1 at Albion did not qualify. However, after major lobbing efforts by coastal businesses, governments, and residents, the design work was finally authorized to continue on the project to replace the dangerous, deteriorating

timber deck over timber truss bridge at Albion, and eliminating its 1 mile of dangerous, meandering access roadways.

Initially, 2 giant concrete arches were designed to span the 1,000 foot wide valley at the mouth of the river. However, the amount of concrete and steel required for this design was not considered appropriate by the newly established War Production Board (WPB) and could not be approved. **The bridge had to be redesigned.** The Division of Highways design engineers accommodated the severe restrictions imposed by the WPB, and the final revised design was approved in 1942 by C.H. Purcell, Director of the California Department of Public Works.

The amount of concrete was limited to foundations, abutments, and only 2 of the 13 bent piers. A steel truss was salvaged from an abandoned Swayne Lumber Company railroad bridge over the south fork of the Feather River near Oroville, 120 miles east of Albion. It was shipped to the Shrader Iron Works of San Francisco and refabricated into a 15 foot deep Pratt truss. This truss was installed onto 135' tall, poured-in-place concrete piers each side of the 130 foot wide river crossing section of the bridge. The remaining trusses are treated timber supported on treated timber trestle type bent piers of various heights on concrete foundations. Salvaged railroad rails were split and used to reinforce the new concrete elements of the bridge, in lieu of standard reinforcing steel.

Redwood, then restricted, was not available for the timber elements of the structure. Consequently the revised design substituted a relatively new product: pressure treated Douglas Fir produced by the Wauna Lumber Company in Wauna, Oregon. They shipped 829,000 board feet of treated timber to Albion. This wood preservation process along with an excellent maintenance program are considered to be the major contributing factors in extending the life of this bridge beyond its estimated 20 years by more than 50 additional years – so far. According to Caltrans' most recent inspection report (2014) the bridge is still in excellent condition.

Construction began in 1943. The bridge was built by the Fred J. Maurer and Son Construction Company of Eureka, California, at a cost of $370,000. T.H. Horn was the resident engineer. The Albion River Bridge was dedicated on June 11, 1944.

....part of the narrative on the application submitted for listing the **Albion River Bridge** on the Department of the Interior's **National Register of Historic Places** by John Roger Johansen, Architect, Albion, California

15 April 2018

An open letter to Caltrans

In 2009, You came to our community
with a most ambitious plan to fix every bridge
on Highway 1 between Ft. Bragg and Albion.
The plan included seismic upgrades and
a continuous, safe, bike path.

Refurbishing Hare Creek Bridge and providing a bike path
to the Roundabout at Simpson Lane would provide
more than 2 thousand county residents
a safe route to Ft. Bragg.

An upgrade at to the Jug Handle Bridge and
an extension of the bike path would open the route
to most of the residents of Casper.

Rehabilitating the Casper Bridge and extending the bike path
to Russian Gulch would open it up to the rest of the
residents as well as providing a safe route to the Park.

After upgrading the bridges at Russian Gulch and Jack Peters Creek, the Village of Mendocino would be added to the route.

Then after minor alterations to the bridge at Big River, total replacement of the small bridge at Little River, and with an extension of the bike path through one of the most dangerous sections on all of Highway 1, Caltrans would arrive at Albion with a stunning portfolio of bridge rehabilitations along with a safe bike path to Ft. Bragg. And ready to present their ideas to rehabilitate our 87 year old historic bridge.

Instead, as Phase One of your plan, you come to us offering to demolish an essential part of the fabric of Albion, along with massive disruption to the environment and our way of life. All to provide a newer version of something we already have, equipped with a bike path to nowhere.

What kind of a support did you expect?

John R. Johansen, Albion

In Defense of her Rail

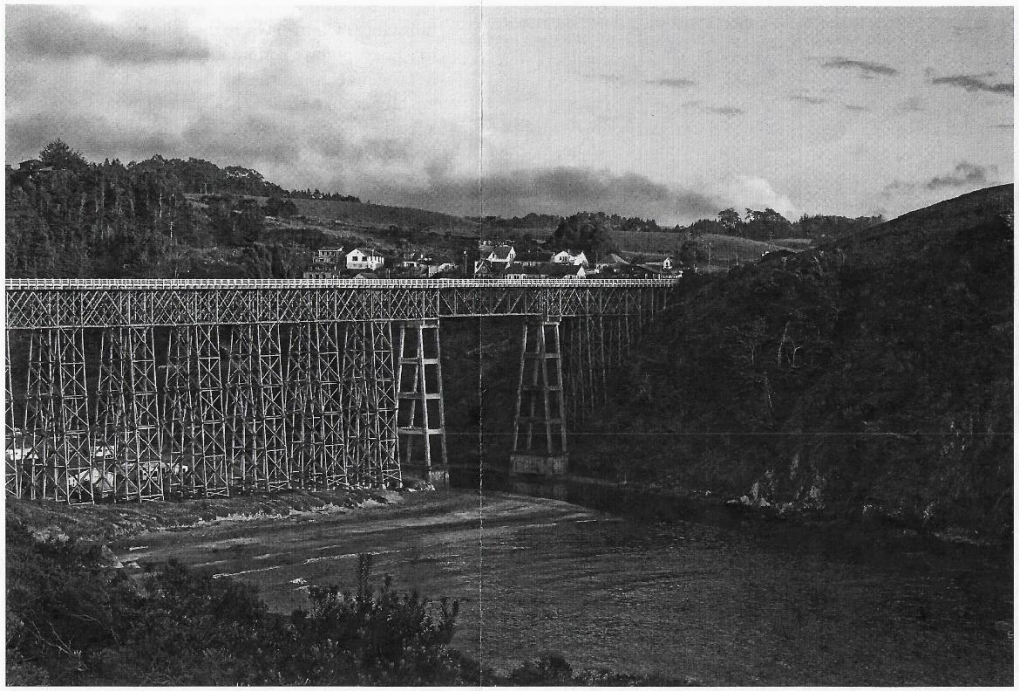
Did you ever wake-up in Albion, just before dawn
and watch the sun rise thru the valley,
gradually igniting the snow-white guardrail
of the Albion River Bridge?
For 74 years, this line of sentries, 150 strong,
Has stood guard on both sides of this
Precious 1 thousand feet of Highway 1.
The cadre stand exactly 76 inches on center
And align perfectly with the major elements
Of the timber structure below.
As you pass over this bridge,
The simple tempo of the rail's march
Gives only a slight indication of the
Magnificent structural engineering symphony
That supports the bridge from the valley below.

I've been waking up before dawn every day in
Albion for 19 years.
And I've experienced the bridge rail light show
Hundreds of times. It never gets old.
I'm always reminded of the lines from
the classic folk ballad: *Across the Great Divide:*

> The finest hour that I have seen
> Is the one that comes between the edge of night
> And the break of day,
> When the darkness rolls away.

I can't speak for her but,
I think Kate Wolf would have wanted to save
The Albion River Bridge.

John R. Johansen, Albion



Crossing a state-designated wild and scenic river, the Albion River Bridge is an iconic part of the Albion landscape, a reflection of the region's timber industry heritage, and a perfect visual companion to the town of Albion. Caltrans is proposing to replace it with a concrete bridge that would be nearly twice as wide and above the berm-dune visible at the base of the bridge (photo ©Rita Crane).

Facts and Figures

Opened for traffic: 1944

Added to state and federal lists of historic places: 2017

Length: 969 feet

Height above river level: 135 feet

Width: 26 feet

Width of proposed replacement bridge: 47 feet

Original cost: $370,000

Cost of replacement bridge:

Caltrans 2013 estimate, roughly $50 million

Caltrans 2024 estimate, $126 to $135 million

About Albion Bridge Stewards

Albion Bridge Stewards is a group of citizens, local and otherwise, working to preserve the Albion River and Salmon Creek Bridges and their Highway 1 approaches.

Join Us Online

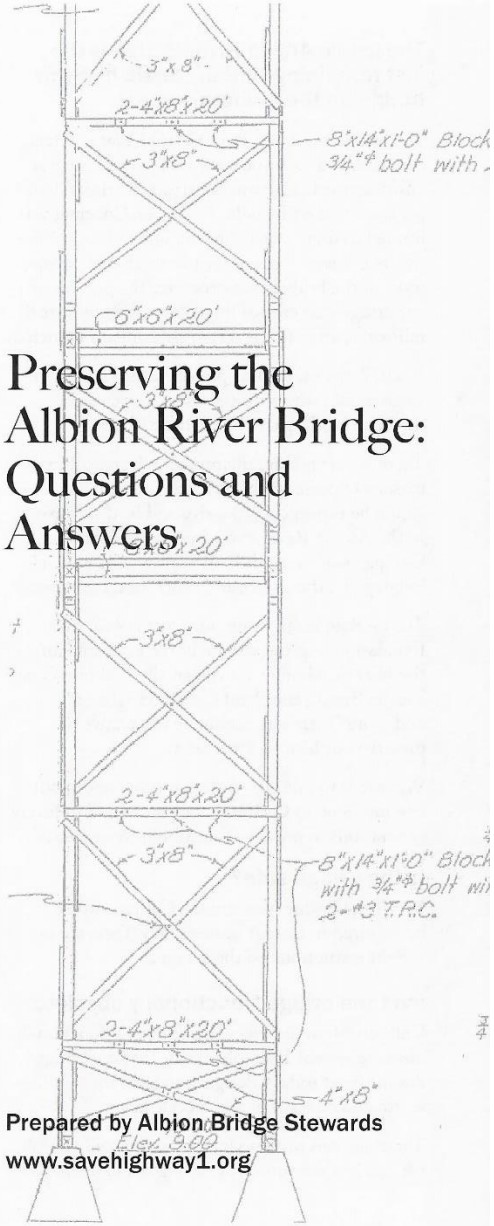
At our website, you can watch videos about the destructive projects that Caltrans has proposed in the Albion area and learn more about the issues we're working on.

Scan the code at right or go to:

www.savehighway1.org

www.facebook.com/savethealbionbridge/

We're also grateful for donations, which help support our efforts.



Preserving the Albion River Bridge: Questions and Answers

Prepared by Albion Bridge Stewards

www.savehighway1.org

The iconic Albion River Bridge is the last remaining timber trestle highway bridge on the California coast.

The bridge was built during World War II. Steel, concrete, and redwood were reserved for the war effort, so the bridge was constructed primarily of pressure-treated Douglas fir timber. Concrete was limited to foundations, abutments, and two of the thirteen "bents"—the large towers that make up most of the bridge's substructure. The portion of the bridge that crosses the Albion River is a steel railroad span that was refurbished in San Francisco.

In 2017, the bridge was placed in the California Register of Historical Resources as well as in the National Register of Historic Places.

There are economic, environmental, and cultural reasons to preserve this bridge. A new bridge would be extremely expensive and be disruptive to the Albion River watershed, the Albion Flats Campground (one of the few affordable tourist lodgings on the coast), and other local businesses.

The tourism industry on our coast is *built* on a foundation of preservation: of the environment, the historic Mendocino village, the Pudding Creek Trestle Bridge, the Point Cabrillo Light Station, and more. There's an economic imperative to preserve our historic structures.

We owe it to our history, to our economy, to our environment, to California taxpayers, and to future generations to preserve the Albion River Bridge.

Is the bridge safe?

Yes. If the bridge were unsafe, Caltrans would be required to close it immediately. There are no weight restrictions on the bridge.

Isn't the bridge "functionally obsolete?"

Caltrans often describes the bridge as "functionally obsolete"—which simply means that the bridge doesn't meet today's design standards for shoulder width and pedestrian and bicycle lanes.

There are tens of thousands of functionally obsolete bridges in the country, including the Golden Gate Bridge and most Highway 1 bridges. Yet these bridges are safe, and there is no legal requirement to replace them.

Appearing on everything from fire trucks to T-shirts, the Albion River Bridge is part of the fabric of the Albion community—just as the Golden Gate Bridge is to San Francisco (photo ©Rita Crane).

The Bixby Creek Bridge on Highway 1 in Big Sur is also a registered historic landmark. It, too, is "functionally obsolete," and in the 1990s, Caltrans spent more than $20 million to retrofit and preserve the bridge.

In 2018, two world-class professional engineers, Ben Brungraber, Ph.D. and Dick Schmidt, Ph.D, assessed the Albion River Bridge and concluded that it was "safe for continued use" and "in remarkably good condition."

Could it withstand a tsunami or earthquake?

Caltrans also describes the Albion River Bridge as being "structurally deficient." One justification for this is that a "1000-year tsunami" might damage the bridge.

Even in this highly unlikely case, Caltrans states that the bridge would likely survive, and any damage would occur from debris striking the bridge when the waters recede. However, there's almost no development east of the bridge. Thus, there would be minimal debris in a tsunami outflow—in stark contrast to areas such as Fukashima, Japan.

As for an earthquake, in 2016, Caltrans performed a seismic retrofit to strengthen the steel portion of the bridge, which was the most seismically vulnerable component.

What about toxins in the timbers?

A representative from the California Department of Toxic Substances Control wrote the following in response to a question by a community member: "Arsenic and hexavalent chromium concentrations we have found are higher than what DTSC considers acceptable for a residence. When we estimate risk for a residence, we are assuming a 24 hour, 365 day/year presence. However, since the areas of contamination are not a residence, but rather in a recreational setting, we do not necessarily think there is an issue with current land use."

What's more, if the bridge is torn down, its timbers would have to be trucked to a Class 1 hazardous waste facility. The closest such facility is in Kettleman City, 300 miles away—hundreds of truckloads of toxic waste on local and state roads.

Lastly, any discussion of environmental hazards must also take into account the environmental impact of a proposed new bridge: not only the disposal of the historic bridge, but the impact of construction on the Albion River, a designated wild and scenic waterway.

Is there room for pedestrians and cyclists?

There are several ways to accommodate pedestrian and bicycle traffic across the Albion River, and they can be added for a fraction of the cost of building a new bridge.

Isn't the bridge expensive to maintain?

The bridge's annual maintenance cost has averaged about $250,000 since its construction—a fraction of the cost of building a new bridge, demolishing the historic one, and transporting and disposing of tons of toxic waste.

Add to this the other benefits of preserving a historic structure: the economic benefits to tourism and local businesses and the intangible but very real benefits to the fabric of a community.

Isn't it cheaper to just build a new bridge?

No. In 2024, Caltrans estimated a new bridge would cost up to $155 million. It's easy to imagine a new bridge costing far more than that, considering that construction wouldn't begin for several more years, and that cost overruns are common.