

Albion Bridge Stewards

A working group of the Albion Community Advisory Board

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By Electronic Mail

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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):

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1. Community Impact Assessment.

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.

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.

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.

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.

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.

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.

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 muddled 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.

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

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.

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.

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).

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.

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.

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.

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.

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