

OCT 28 2021

Hare Creek Bridge geotechnical investigation

Planning & Building Services

I understand that this project is needed in order to aid future bridge foundation design for the Hare Creek Bridge retrofit. I agree that this bridge has not been in good shape for many years. I understand that the current width is too small for safety reasons for pedestrians and motorists alike. Also this bridge that was constructed in 1947 never got an earthquake retrofit.

I realize that here are no active earthquake faults in Fort Bragg. However, the San Andreas fault is located approximately 9 miles to the west, and the Maacama fault is 22 miles to the east. Major earthquakes can occur on these faults. Seismic activities can cause major disruptions of the City's transportation and emergency services network. Should the Pudding Creek, Noyo River, and/or Hare Creek Bridges become unusable following a seismic event, people may not be able to evacuate, and emergency access would be blocked. Potential hazards associated with earthquakes include: rupture of the ground surface by displacement along faults, shaking of the ground caused by the passage of seismic waves through the earth, ground failure induced by shaking, such as landslides, liquefaction and subsidence of unstable ground, and tsunamis. Non-seismic geologic hazards include the presence of unstable soils on steep slopes and expansive soils which, in the presence of moisture, will swell and shrink when returning to a dry condition. Fort Bragg's map SF-1: Geologic Hazards identifies areas of potential landslides. In an emergency Fort Bragg plans to evacuate everyone that lives south of East Oak Street across Noyo Bridge and Hare Creek Bridge.

I think it is crucial that Caltrans will work closely with the City of Fort Bragg. Only good communication with the City will help during the month that Caltrans plans to have one way traffic from 8pm to 6am on Hare Creek Bridge while doing the geotechnical investigation. I understand that this project will undergo a separate permitting and environmental review process in the next 2-3 years, but do not agree that this can be categorically exempt pursuant to CEQA Guidelines, Section 15306, Information Collection, Class 6 provisions pertaining to data collection, research, and resource evaluation. Class 6 consists of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes. I therefore am in opposition to this project and am asking you to request at a minimum a Mitigated Negative Declaration. I believe that it is not consistent with the Mendocino County Local Coastal Program. I believe that this project will be detrimental to the public health, welfare or safety, or to be a nuisance unless a Mitigated Negative Declaration will first be done.

Considering the National Wetlands Inventory the Hare Creek environs contains Estuarine and Marine Deepwater, Estuarine and Marine Wetland, Freshwater Emergent Wetland, Freshwater Forested/Shrub Wetland, and Riverine.

The City of Fort Bragg got grant money from Caltrans and other entities to develop the South Main Street Access and Beautification Plan which points out the importance to improve the aesthetic qualities of the South Main corridor including the Highway 1/20 interchange which is a major gateway to the City of Fort Bragg — and to promote a high-quality environment for residents and visitors alike.

The area west of Hwy 1 to the north of Pudding Creek offers a great pedestrian environment as the Landtrust owns the 5.8 acre property, next to the 18 acre Patton property available to all and the Mendocino College, the Frisbee golf area, and the area

The California Coastal Trail (CCT), a statewide trail planned to extend 1,197 miles from Oregon to Mexico, will include Mendocino County's 131 miles of shoreline. The trail on the 400 acre mill site property to the north, and the Pomo Bluffs Park that encompasses 25 acres of land on the southern bluffs above Noyo Bay offers spectacular bluff-top views with outlook points and benches, coastal pedestrian and bike trails, as well as interpretive exhibits. A trail from the north side of Hare Creek leads to the beach, as well as an existing pathway, the Creekside Trail leads to Hare Creek Beach from the south.

Scenic resources of the study area include beaches, dunes, high bluffs, sea-stacks, jutting headlands, wetlands, heavily wooded gulches, grassy upland terraces, pygmy forests, serene river estuaries, and coastal streams. The

beauty and accessibility of the Mendocino coast have made it a heavily used tourist and recreational area. Scenic resources are the basis of the coast's tourist and retirement economies as well as an attraction to residents in general.

Special Treatment Areas (STAs) buffer zones were also located adjacent to all publicly owned preserves and recreation areas, including national, state, regional, county, and municipal parks. These buffer zones include those forested areas within the coastal zone within 200 feet of all such publicly owned preserves and recreation areas. In addition we have "Highly Scenic Areas".

One of the greatest threats facing Mendocino County's resources is a decline in the quality of water in coastal streams. Although this decline has affected a broad range of aquatic habitats, it has especially affected populations of anadromous fish species. A recent study by the North Coast Regional Water Quality Control Board found that native coho salmon have declined by 80 to 90 percent from their numbers in the 1940's. National Marine Fisheries Service data on commercial landings of coho indicate a decline from 3.6 million pounds in 1976 to 11,000 pounds in 1992. Many of Mendocino County's large coastal watersheds either have no coho left, or have only very small populations. The study by the Regional Board also found steelhead trout numbers to be very low relative to estimates of past numbers. Due to this drastic decline in numbers, several years ago the U.S. Secretary of Commerce listed chinook, coho and steelhead as "threatened" throughout the central and northern coast of California. According to the Land Trust's document there are still some Steelhead and Coho Salmon in the Hare Creek. Some sources of decline in water quality stems from landslides and highways.

The Hare Creek originates in the Jackson Demonstration State Forest an area of 48,652 acres The mouth of the Hare Creek empties at a small sandy beach that can hold 100's of gulls, especially in winter, and lots of shorebirds, especially in fall. The Hare Creek Watershed is in a Priority Conservation Area of the Coastal Zone.

The area to the north of Hare Creek where Caltrans trucks and cars might be tempted to park and/or drive to in order to be close to the bridge is a Special Revue and Sensitive Runoff Area. Fort Bragg's Policy SF-2.3: Development on Slopes require that development in areas with identified slope stability constraints as shown on Map SF-1 or other areas where City staff determines there is potential slope stability issues be supervised and certified by a geologist, geotechnical engineer, or engineering geologist. We have such an area to the north of Hare Creek.

The area is also an Open Space and Environmentally Sensitive Area. The 18 acre Patton property next to Hare Creek offers a great scenic view toward the ocean, Noyo River and Hare Creek. It is also an area where you can see the White-tailed kite. In the original application it was indicated that this project was not in a highly scenic area. I disagree. In the staff report you write "the site is currently developed with an existing scenic two-lane highway." You write that "it is not anticipated that the proposed work will have impacts to the existing public access on the south side", but it will impact the access on the north side.

The noise level during night time in a rural area is too loud and needs to be muffled. You wrote "The proposed geotechnical borings will occur adjacent to residential land uses and as such there is a potential for inconsistency between the two uses. As such, Condition 10 is recommended, requiring that the Applicant adheres to the Noise Standards provided in Appendix B of Title 20, Division II of Mendocino County Code. Geotechnical test borings shall comply with the exterior noise limit standard of 75 dBA for any time period, which is not to be exceeded more than thirty (30) minutes in any hour. "

You indicate that " traffic related impacts would be of short duration and are necessary to allow crews to safely perform the necessary data collection at each location" without indicating if short means 5 min., 10 min. or 20 min.

You wrote "studies and surveys including a wetland delineation, field surveys to map natural communities, botanical surveys to determine the presence/absence of special status plants, and habitat assessment for special status species were conducted within the Biological Study Area (BSA) of the project. Why could they not be

added as a link to the staff report? You wrote “all feasible mitigation measures are required as conditions of approval (Conditions 9, 10, 11, 12, and 14) to reduce project impacts to a less than significant level. The proposed project is therefore consistent with Mendocino County Code regulations for the protection of natural resources. “ How do we know?

Since Mendocino County Code requires that all proposed improvements be located a minimum of one hundred (100) feet from all sensitive habitats, unless a qualified biologist prepares a Reduced Buffer Analysis to reduce the buffer to fifty (50) feet and as temporary project related borings, grading, vegetation removal/cutting, and equipment staging activities will be located within fifty (50) feet of several identified ESHA it is crucial that at a minimum a Mitigated Negative Declaration will be done.

“The selected boring locations avoid impacts to ESHA to the greatest extent feasible” is not good enough, neither is it to indicate that “the proposed project is designed to avoid ESHA whenever possible.” You indicate that “areas where temporary ground disturbance is unavoidable would be remediated with BMPs including remedial grading, re-seeding, invasive plant control, erosion control, and post project monitoring. All project impacts to identified ESHA are anticipated to be temporary and would not result in a significant degradation of the resources.” You wrote that the “BSA is within an area that experiences existing noise and visual disturbance from SR 1, adjacent homes/businesses, and homeless encampments in the area. Therefore, species in the BSA are expected to acclimate to short-term increases in activity in the area during geotechnical investigations. Long term effects would be negligible because special status wildlife and plants are expected to continue to use the area after the project, and the project duration is expected to only take place over the course of 30 days. With implementation of standard measures described in Section 1.3.1, the project would not result in substantial degradation to ESHAs.” I do not believe that the damage would be temporary. I have watched how Caltrans’ subcontractors handled a geotechnical investigation at the historic Albion River Bridge and Salmon Creek Bridge.

I realize that it will take Caltrans several years to come up with design for a future bridge foundation for the retrofit, and realize that for this work CEQA would have to be addressed.

Resources:

<https://city.fortbragg.com/DocumentCenter/View/2456/2011-South-Main-Street-Access-and-Beautification-Plan-PDF?bidId=>

http://www.mendocinolandtrust.org/site/assets/files/1161/mendocino_county_coastal_conservation_plan_2003.pdf

<https://city.fortbragg.com/DocumentCenter/View/1258/Element-07--Safety-PDF?bidId=>

Please deny this project as is and demand a Mitigated Negative Declaration.

Sincerely, Annemarie Weibel
10-28-2021

