

Mendocino County

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Planning &amp; Building Services

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**To:** <pbscommissions@mendocinocounty.org>  
**Date:** 11/16/2021 11:26 AM  
**Subject:** public comment on CDP\_2019-0024

As a 32-year resident of Albion, I'm writing to respectfully urge the denial of Caltrans application for case #CDP\_2019-0024 ("Standard Coastal Development Permit to make safety improvements and perform rehabilitation on State Route (SR) 1 from post mile (PM) 41.78 to PM 42.3.")

I'll start this letter with the bottom line: Caltrans is proposing to impose a generic solution on a location that is far from generic — an area with unique scenic, environmental, and even economic importance. Although safety and drainage improvements are needed for this stretch of Highway 1, there are far less destructive options, and Caltrans needs to go back to the drawing board to explore them.

There are dozens of reasons why this permit should not be granted, and they are listed in separate correspondence provided by Albion Bridge Stewards, of which I am member.

I'll focus here on what I consider a few of the most fundamental reasons.

First, it's essential to consider this unique location.

The project location directly abuts a spectacular stretch of protected lands, the Navarro Point Preserve — 56 acres of unspoiled coastal bluff, with beautiful views not only of the ocean the west, but also of a coastal terrace to the east.

The area east of the highway — the west-facing edge of Navarro Ridge — is a textbook example of a coastal marine terrace. Caltrans is proposing to utterly deform this marine terrace through a huge amount of grading and shaping. More about that shortly.

This designated Highly Scenic section of the Mendocino Coast is the first glimpse that a vast number of visitors see when they arrive via Highway 128. Currently, they see unspoiled landforms to the east and a broad coastal plain to the west. With Caltrans' plan, visitors would see a broad coastal plain opposite a scarred, highly engineered landform more visually consistent with an urban freeway.

It's absolutely inappropriate. The proposed project is GROSSLY OUT OF SCALE and INCOMPATIBLE WITH THE LOCATION.

----- Impact to wildlife -----

This section of the coast is lightly developed and as such, supports a rich array of wildlife. The Navarro Point Preserve hosts a pair of breeding peregrine falcons, a designated protected species. A local member of the Mendocino Coast Audubon Society wrote to me, "I've seen them hunting the hillside on both sides of the Highway." Note: BOTH SIDES, including the side that Caltrans proposes to grade and scar.

Bald eagles nest around the Albion and Navarro Rivers, and are frequently seen foraging in the Preserve and on the marine terrace that Caltrans proposes to grade.

Other birds of prey that are frequently seen here include the white-tailed kite, Northern harrier, ferruginous hawk, red-tailed hawk, Coopers hawk. Winter visitors include the American kestrel, another species of falcon. As a member of the Mendocino Coast Audubon Society recently wrote to me:

"Populations of American Kestrel are in a long-term decline, primarily from alteration of their breeding habitat, so having good winter foraging territory may be key to stabilizing the population. The Mendocino coast provides good winter habitat and the population that winters here avoids the cost of migrating to Mexico or South America, giving them an edge over the rest of the population."

Clearly, this area is perfect habitat for large birds of prey, many of which are in decline due in part to development and the kind of large, non-native forests that are common between Mendocino and Fort Bragg.

A partial list of birds that have been identified at the Navarro Point Preserve is here:

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2febird.org%2fphotospot%2fl2288223&c=E,1,aSqP2AGS7DFd\\_TPWigYvo\\_0Z63R7qwfQfRk59jfrFRBio04e-ReA0ESDoXJIE\\_i9eP3Z3vGnaST4UBBhyRjZX2nIHoSWSAz0RPMXH9\\_Y25NBTtCGg,,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2febird.org%2fphotospot%2fl2288223&c=E,1,aSqP2AGS7DFd_TPWigYvo_0Z63R7qwfQfRk59jfrFRBio04e-ReA0ESDoXJIE_i9eP3Z3vGnaST4UBBhyRjZX2nIHoSWSAz0RPMXH9_Y25NBTtCGg,,&typo=1)

Caltrans' proposed plan would not only disrupt wildlife during the likely two-year construction window, but the permanent alterations of the landforms and existing vegetation would negatively affect the food sources of the birds that thrive here.

(Caltrans' application promises a revegetation program, but the agency has a poor track record of keeping such promises. Witness the scar at the north end of the Albion River Bridge, where a geotechnical investigation occurred a few years ago.)

#### ----- GRADING IN UNSTABLE SOILS -----

The amount of grading that Caltrans is proposing for this project is staggering: well over 10,000 cubic yards. (Consider that a typical dump truck holds 10 to 14 cubic yards, and consider the impact that all those to-and-from truck trips will have on local traffic and the highways.)

Besides scarring a marine terrace in a Highly Scenic area opposite a popular preserve, the proposed grading sets the stage for landslides in what are unstable soils. When the driveway opposite the Navarro Point Preserve was constructed in the 1990s, a large slide occurred that necessitated a halt in construction while riprap and other reinforcement was installed.

That's just for a driveway. What will happen when over 10,000 cubic yards are carved out of the marine terrace?

Caltrans doesn't know what will happen, because no geotechnical investigation has been done. (If one has been done, its results have been kept secret.)

#### ----- THE CALTRANS PROJECT NEXT DOOR -----

These reasons alone are reasons enough to deny the current application, but there's more.

Caltrans is proposed a SECOND major project, the so-called Drainage Project (CDP\_2019-0034) directly north of this project.

Caltrans is describing this as a separate project, but let's be honest: they're only separate on paper. The projects are directly next to each other. The staging areas are the same. Construction would take place at the same time. Traffic disruptions would take place at the same time.

Thus, under CEQA, Caltrans and the County MUST assess the cumulative impact of these two projects.

#### ----- IS THIS SEGMENT OF HIGHWAY REALLY UNSAFE? -----

It's also worth questioning Caltrans' fundamental claim that this section of Highway 1 is particularly dangerous. Caltrans cites three accidents within a three-year period. There have been more accidents at and around the intersection of Big River Beach Road and Highway 1 in that time frame.

Caltrans states "this segment of highway has an actual Fatal collision rate of 18.6 times the Statewide Average (SWA) for similar facilities, an actual Fatal + Injury (F+I) collision rate of 2.0 times the SWA for similar facilities, and actual total collision rate of 1.5 times the SWA for similar facilities." But Caltrans never specifies exactly what a "similar facility" is. What are the sections of highway that Caltrans is comparing to? Without this information, Caltrans' figures are statistically worthless.

----- ALTERNATIVES -----

As I stated at the beginning of this letter, Caltrans needs to explore alternatives to this destructive, grossly out-of-scale project.

To reduce the likelihood of run-off-road accidents, Caltrans could simply install a radar sign as a caution to motorists.

Another alternative might be a scaled-down widening of Highway 1: a two-foot shoulder on only the west side of the highway, with a causeway-type structure spanning the section of Highway 1 that has been undermined by Caltrans' previous drainage-control failures.

My point is that there just HAVE to be less alternatives to this environmentally sensitive, highly scenic, protected location. I'm obviously not a highway engineer, but Caltrans has some excellent ones, and they need to be told, "try again."

Caltrans' answer to everything is "12 foot lanes, four-foot shoulders, with rumble strips and guardrails" but that answer isn't appropriate for every location. The Planning Commission needs to tell Caltrans, "come up with a plan that is appropriate for this location. Analyze the soils to make sure any grading won't lead to problems. And analyze and report on the cumulative impact of this this project and the project next door, the drainage project."

You have the opportunity to put the brakes on an expensive, destructive, overkill project that will scar a beautiful and protected section of the coast. Please don't pass up that opportunity. There's time for Caltrans to do a better job. Please make them do that job.

Thank you for your consideration.

Respectfully,  
Jim Heid  
Albion