

From: Annemarie <aweibel@mcn.org>
To: <pbscommissions@mendocinocounty.org>, <gonzalez@mendocinocounty.org>, J...
Date: 11/16/2021 4:52 PM
Subject: Public comments CDP_2019-0024 (CALTRANS)

Thanks for accepting my comments, Annemarie Weibel

Public comments CDP_2019-0024 (CALTRANS)
Reg. 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. The project proposes to widen the existing lanes to 12 feet each, widen the existing shoulders in both directions to 4 feet, install a Midwest Guardrail System (MGS) treated with light-brown stain, improve the superelevation, reestablish the drainage facilities and 6-foot box culvert for wildlife passage, replace the centerline rumble strip, and remove up to 75 trees.

I am respectfully urging you to deny this application. It is my understanding that a determination of noticing can not be made as immediate neighbors have not been notified, neither have the Albion Ridge Stewards.

In addition a staff memorandum was added (19 pages) less than 10 days before the hearing that I have not been able to thoroughly read. This project is incomplete, ambiguous, and inaccurate. This project needs an EIR and in no way qualifies to be Categorically Exempt per Class 1d, Section 15301, and it has significant impacts on the environment as defined by NEPA as well. This project is a piecemeal project (not allowed under CEQA) that changes the character of the area. This project and (CDP_2019-0034) need to be 1 project. That way it would most definitely not qualify to be Categorically Exempt. It looks as if only 0.05 of a mile separates these projects, but the cumulative aspect still has to be considered. The staging areas seem to be the same, construction would most likely take place at the same time. Traffic disruptions would take place at the same time, which would add more time people would be stuck in traffic. Thus, under CEQA, Caltrans and the County must assess the cumulative impact of these two projects. There will be also be a significant cumulative effect by this project and others next to it (CDP_2019-0034), Salmon Creek Lead project, possible Salmon Creek Bridge Replacement and possible Albion River Bridge Replacement. With the widening of Noyo Bridge it is now necessary to widen the Hare Creek Bridge. The widening of Gualala, Cleone, and possibly Richardson Grove all have cumulative effects felt up and down the coast. These projects appear to part of the broader Hwy 1 widening project that includes all the bridge replacements, but Caltrans cut it up into little pieces and are seeking permits on a piece-by-piece basis. Each of these little projects is being determined to be categorically exempt. This seems illegal when they really need a programmatic CEQA document covering the entire scope of the broader project to widen Hwy 1 and replace/rehabilitate the various bridges. This project has a significant effect on the environment, and it damages the scenic resource. As this is the Gateway to the Coast we need to consider this unique location! This area is environmentally, and economically crucial. The project location is located directly next to an amazing stretch of protected lands, the 56 acres Mendocino Land Trust's Navarro Point Preserve, an unspoiled coastal bluff, with gorgeous views towards the ocean the west, and a coastal marine terrace to the east. This project would deform and scar this marine

Mendocino County
NOV 17 2021
Planning & Building Services

terrace. Grading was not properly addressed in this project. As we find out from Glickfeld's public comments the drainage issues have been ongoing for many years just like so many other areas next to Hwy 1 where dead trees are indicating the drainage issues. The issue about the interference with Coastal Access (missing connection for the Coastal Trail) referred to in Glickfeld's public comments is a Coastal Act issue and needs to be addressed.

Drainage improvements are needed for this stretch of Hwy 1. I believe that there are far less destructive ways to deal with that issue.

Caltrans' plan is to grade over 10,000 cubic yards. It would affect the whole stretch of the project and the Navarro Point Preserve as landslides often happen with unstable soils. Where is the geotechnical investigation? Isn't that the speciality of SHN's business that Scott Perkins is working for? Only an EIR can address these issues. I understand that the contractor performing the work would provide proof of appropriate disposal of exported material to both the Caltrans Resident Engineer and the County. An air quality permit would be required for grading of 1 acre or 1 mile of road or greater. With that many cubic yards to be disposed somewhere it would be helpful to know where it would be disposed in order to know how much it would impact traffic and air quality.

Caltrans claims that this section of Highway 1 is very dangerous. Would it not be infinitely more dangerous if the road is wider and straighter, and motorists (mostly tourists) who already can not get to their destination fast enough will be driving even faster?

Apparently the delay for automobiles would only be 10 minutes using one way access, but the duration of the project would take two years instead of one as it would not be possible to work during the rainy season. With project (CDP_2019-0034) also taking one year (meaning two) would we have a construction site for four years? Even though access to side roads and residences will apparently be maintained during construction it will have a huge effect on traffic. It will have an impact especially on tourists who might have to drive through Comptche-Ukiah Road, Albion-Little River Road, and Flynn Creek Road to access the coast and would not be interested to visit Navarro Point Preserve. This public access points will be impacted by the project. There is no analysis of the project impacts on the Navarro Point trail where it runs near the proposed widened highway prism and omits mentioning how Caltrans' fence plans during construction would affect it. The well loved and frequented Ledford House and Albion River Inn would feel the loss of customers. The proposed development would diminish public access to Mendocino County coastal areas and does not conform to the goals and policies of the Coastal Element of the General Plan. The staff report does not analyze the outdated traffic management plan for impacts on recreational, emergency response, work day traffic along this segment of HWY 1.

Locals who live close by are vehemently opposed to the noise caused by motorists who drive over the edgeline and centerline rumble strips. To place guardrails in this area is not consistent with guardrails along the ocean in other areas. Otherwise we need now guardrails everywhere along this highly scenic Hwy 1.

Without an EIR that would include information from local Native American tribes we can not assess how a significant historical resource would experience an adverse change. For this project the notified tribes did not provide responses to the requests for comment. Projects located next to this site had information about the effects on land deemed sacred by the local tribes.

The project would be located adjacent to ESHA. The proposed development is not consistent with ESHA policies. Unless you do an EIR you will not know if the resources are significantly degraded by the proposed development; if there are no feasible less environmentally damaging alternatives; if all feasible mitigation measures are capable of reducing or eliminating project related impacts. Without an EIR appropriate protection measures can not be incorporated into the project. This project has no coherent/complete project impact area revegetation plan. Apparently erosion control planting and additional revegetation would be implemented. When you are dealing with wetlands this has to be dealt with great care & knowledge in order for the existing plants to continue to flourish. This is what we were told as well with the Albion River Bridge, but not much has happened after the geotechnical investigation, not even the removal of invasive plants. This project has no coherent/complete project impact area revegetation plan. Without an EIR we will not know if the proposed work is consistent with the policies related to buffer areas (20.496.020), wetlands (20.496.025), other waters (20.496.030) and riparian areas (20.496.035). Riparian areas provide important habitat for many endangered and threatened species and other wildlife and plants. They also are usually more diverse and have more plants and animals than adjacent upland areas. Apparently 75 trees would be removed.

The Navarro Point Preserve hosts a pair of breeding peregrine falcons, a designated protected species. 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 seen frequently in the area are white-tailed kites, Northern harriers, ferruginous hawks, red-tailed hawks, and Coopers hawks. Winter visitors include the American kestrel, another species of falcon. According to an Albion resident and Audubon member "Populations of American Kestrels 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%2fbird.org%2fhotspot%2fL2288223&c=E,1,s_J34fdh1jfmFKChQe5ePs9N2pcOv8sqiHEh4c746033KnPB0T18ZSjOZKHqEWQRgs8NpJhViw90I_Sp0uAEzg4gmpA-YKA97LKY1-MIFkq9G3gigaq&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.

The staff report proposes conditions of project approval that are, in various parts, ambiguous, inconsistent, incomplete, fail to achieve project compliance with the relevant LCP and Coastal Act standards, and lack a project mitigation monitoring/reporting plan. Without that there are no standards for project implementation in compliance with the CDP, if the project were otherwise consistent with the LCP/Coastal Act, which it is not.

The staff report is unsupported by the required complete analysis of the project components with all relevant Coastal General Plan standards; the

land use map; zoning map; coastal zoning ordinance standards; and the Coastal Act public access/recreation policies. It needs an EIR.

This project is absolutely inappropriate. The proposed project is GROSSLY OUT OF SCALE and INCOMPATIBLE WITH THE LOCATION. The contractor performing the work would provide proof of appropriate disposal of exported material to both the Caltrans Resident Engineer and the County. Excavation of the west-facing Navarro bluff to a height of 52 feet above the roadway was not mentioned in terms of landform stability as there was no grading plan included. An air quality permit would be required for grading of 1 acre or 1 mile of road or greater. With approximately 11,000 cubic yards to be disposed somewhere it would be helpful to know where it would be disposed as the 4,000 dump trucks needed for that should be accounted for in the staff report. This project is absolutely inappropriate. The proposed project is GROSSLY OUT OF SCALE and INCOMPATIBLE WITH THE LOCATION. Thank you for your consideration.

Respectfully,
Annemarie Weibel
43 resident of the coast and residing in Albion since 1983
member Albion Bridge Stewards
Albion