

James Feenan - Fwd: Public comments CDP_2019-0034 (CALTRANS)

From: Julia Krog
To: James Feenan
Date: 11/16/2021 5:00 PM
Subject: Fwd: Public comments CDP_2019-0034 (CALTRANS)
Attachments: 34.pdf

Mendocino County

NOV 17 2021

Planning & Building Services

>>> Annemarie <aweibel@mcn.org> 11/16/2021 4:48 PM >>>

Thanks for accepting my comments, Annemarie Weibel

Public comments CDP_2019-0034 (CALTRANS)

Permit to upgrade and repair approximately 0.1 miles of State Route (SR) 1 by relocating the drainage system to the natural channel, repairing failed roadway embankment side-slopes and the embankment adjacent to an existing private driveway, improving the roadway geometry and increase the roadway travel lanes to 12-foot wide each and increasing paved shoulders to 4-foot wide within the project limits. This project goes from PM 41.30 and 42.50.

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.

No information was included that would justify widening the road and the shoulders (traffic accidents...etc.).

This revised project is still 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. There will be a significant cumulative effect by this project and others next to it (CDP_2019-0024), 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. This project is a piecemeal project (not allowed under CEQA) that changes the character of the area. It needs an EIR. Widening a HWY is different than maintaining a HWY. Cutting down 75 trees without being able to successfully plant new trees in this harsh, windy, and salty environment is a major change and needs an EIR. As there is no information given we have to assume that both these projects (CDP_2019-0024) are happening at the same time, which would add more time people would be stuck in traffic. I do not understand that this project and (CDP_2019-0024) are not 1 project. If that would be the case it would probably not qualify to be Categorically Exempt. It looks as if only a half a mile separates these projects, but the cumulative aspect still has to be considered. This project has a significant effect on the environment, and it damages the scenic

resource. 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. (Copies of 2 reports from local Native American tribes)

The project would be located within, adjacent to, and within 100 feet of ESHA. The staff report indicates that there would be no impact to ESHA's expected, but then mentions that there are temporary, not long term impacts. 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. The biological studies are variously 2-4 years out of date. Apparently the day someone looked for Behren's Silverspot butterflies none were seen. Were any host plants seen? What about *Calystegia purpurata* ssp. *Saxicola*? The 28-foot by 9-foot rock energy dissipater that would be installed at the outlet would definitely impact the highly sensitive areas that has many rare plants. 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 5 tree stumps would be removed and 3 wax myrtles. Why would it be necessary to count how many trees were cut afterwards if it should be clear from the get go how many will be cut? The various changes to area hydrology (overland flow, percolation, groundwater), were not mentioned in the staff report, nor how the new, larger, longer culverts would impact the wetlands in the Navarro Point Preserve, on the nearby Navarro bluff near Post Mile 42.3, or on the existing drainage channels (that Caltrans proposes to fill).

The project description mentions that the roadway would increase the travel lanes to 12 feet wide each and increase the paved shoulders to 4 feet wide within the project limits. It would help to know how wide the travel lanes are now, but regardless this is out of character to a highly scenic area that is the gateway to the Coast!

Temporary High Visibility Fencing would need to be in green (and not in orange) to protect the scenic resource better. The 170-foot section of barbed wire (3-Strand Wire and Wire Mesh, Metal Post) right of way fencing in the erosion area that would be reconstructed would destroy the scenic area. Would that remain even after the construction is over? The excavation of the west-facing Navarro bluff to a height of 52 feet above the roadway would further destroy the scenic resource and would not qualify for a CEQA exemption.

Apparently the delay for automobiles would only be 5 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_2019-0024) 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. Apparently erosion control planting and additional revegetation would be implemented during a 5 year maintenance and monitoring period. Also the area would be replanted after 1 year. Apparently a permanent erosion control seed mix would be used. 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. The CCC would be used. 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. The CCC was apparently not available. This project has no coherent/complete project impact area revegetation plan. 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. The staff report proposes 11 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.

Thank you for your consideration.

Respectfully,

Annemarie Weibel

43 resident of the coast and residing in Albion since 1983

Albion

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