

Friday, May 1, 2015

Caltrans
Attn: Adele Pommerenck
Office of Environmental Management
703 B Street
Marysville, CA 95901
adele.pommerenck@dot.ca.gov

RE: Replacement or Rehabilitation of the Albion River Bridge (No. 10-0136)

Thank you for the opportunity to share concerns regarding the proposed replacement or rehabilitation of the Albion River Bridge.

The Albion Community Advisory Board (ACAB) presents the following concerns for examination in the Environmental Impact Report (EIR). ACAB's concerns fall into a variety of categories that parallel those of the Notice of Preparation dated April 1, 2015 and signed by Adele Pommerenck from the Caltrans Office of Environmental Management. What follows are specific comments, questions, and requests that relate to each of these categories.

Visual/Aesthetics

The Albion River Bridge itself is a view whose potential loss has both aesthetic and economic impact. The current bridge is visually compatible with the historic structures located just north and south of it, and with the historic qualities that are a critical part of the Mendocino Coast's appeal and its economy.

ACAB is concerned that a new bridge and Caltrans' proposed widening of Highway 1 would be out of scale with a highly scenic, sparsely populated section of the Mendocino coast. ACAB requests that the EIR consider all viewsheds, both from the bridge and of the bridge, when evaluating this project.

ACAB urges that all options to rehabilitate the existing bridge be thoroughly explored—for example, adding a cantilevered bike and pedestrian path to the existing bridge.

If the bridge is to be replaced, a new bridge must be in harmony with the existing buildings in style, in scale, and in building materials. The railing style of a new bridge must maximize the ocean viewshed for motorists. The bridge must comply with local coastal guidelines with respect to a designated highly scenic area.

Agriculture and Forest Resources

Replacement of the bridge could result in the removal of agricultural lands from production. Additionally, traffic delays due to construction could impact forestry commerce because of impacts on logging truck traffic. ACAB requests that the EIR address these issues in its Community Impact Assessment.

Air Quality

There will be toxic releases of metals during bridge rehabilitation or replacement. ACAB requests that the EIR address containment of these releases as well as greenhouse gas emissions from construction equipment and vehicles idling while delayed in traffic, and urges that the EIR incorporate mitigation measures for these emissions. ACAB requests that the EIR require compliance with all relevant state-mandated air quality and emission standards during demolition and/or rehabilitation and construction.

Biological Impacts

ACAB is concerned about biological resources in the proposed construction area. These include, but are not limited to, coho salmon, perch, crab, near-shore fisheries, a heron rookery, butterflies, birds, marine mammals, and salamanders. In recent years, bald eagles have frequented the lower Albion River, and ospreys routinely hunt in the Albion Bay. Estuarine plants, such as eelgrass, could also be impacted.

There will be impacts to flora and fauna during construction, both from hazardous materials as well as from construction noise and general disruption. ACAB requests a comparison of biological impacts between rehabilitation and replacement of the Albion River Bridge, and of east or west alignments of a proposed replacement bridge, and of a “no project” option.

Community Impacts

The proposed project would significantly impact the community in numerous ways, and ACAB requests that the EIR address these impacts. Our specific requests can be found throughout this document, and include the visual and aesthetic issues addressed above, economic impacts to local businesses caused by traffic delays and construction noise and disruption, and traffic delays for emergency response vehicles and the potential impact on insurance availability and rates for local residents.

Cultural Resources

ACAB is also concerned about potential disruption to archeological artifacts that may exist in the proposed project area. Archaeological excavation must be done prior to construction, and any archaeological and historic resources must be protected and preserved.

Additionally, the Albion River Bridge has been submitted for designation as an historic landmark. The present bridge is a powerful link to the past. As the last remaining wooden bridge of any significant size on the California coast, its design and appearance speak to the importance of timber production in Albion. The bridge is also historic because it directly speaks to the era during which it was built: the World War II era, when steel was needed for the war effort.

ACAB requests that the EIR address how rehabilitation versus replacement could impact the bridge’s potential historic designation. Similarly, we request at the EIR address the impact of a potentially wider bridge and highway on the Scenic Highway System eligibility of this section of Highway 1.

Hazardous Materials

If the current bridge is to be replaced, there will be toxic materials released from the pillars and soil, treated wood, asphalt, and paint. ACAB requests that the EIR require details on how these materials will be stockpiled and/or transported as well as on the risks of contamination from trucks carrying hazardous materials. ACAB also asks that the EIR detail potential impacts to the Albion River from a toxic release.

The soils near the existing bridge appear to contain above-normal levels of arsenic. ACAB requests that the EIR compare removal of this contaminated soil versus on-site treatment or containment of it. Leachate must be contained, along with any toxics resulting from sandblasting and painting.

There may be toxic releases of metals during bridge rehabilitation or replacement. ACAB requests that the EIR address these risks and their mitigation.

Hydrology and Water Quality

ACAB requests that the EIR address methods of protecting the Albion River during any construction or rehabilitation project. ACAB also requests that the EIR address the effects of construction on river hydrology as well as on drainage patterns on the Albion Head wetlands. Additionally, we request that the EIR address the effects of excavation and erosion on the headland at the northern end of the Albion River Bridge due to the geophysical limitations of that site.

We also request that the EIR address the river's designation by the North Coast Regional Water Quality Control Board as impaired for sediment and temperature, and the possible effects of construction on these impairments.

Wild and Scenic River

The Albion River is designated as a Wild and Scenic River. ACAB requests details on the development limitations of this designation and on whether bridge replacement would affect the designation.

Land Use and Local Coastal Plan Issues

With respect to Local Coastal Plan (LCP) restrictions, ACAB requests an analysis of rehabilitation versus replacement of the Albion River Bridge, as well as a "no project" alternative, as per CEQA Section 15126.6.

Noise

Noise from construction activities will have a significant impact on residents and businesses located near construction areas. ACAB requests that the EIR address these matters as well as the impact of noise on birds, listed fish species, and other wildlife. Additionally, if work is to be done at night, we request that the EIR address both noise and light pollution issues, as bright nighttime construction lighting could negatively affect nearby residents as well as wildlife.

Recreation

ACAB is concerned about the loss of recreational opportunities that will occur during the proposed project. These activities include camping, fishing, crabbing, abalone diving, hiking, and ocean, beach, and river access. These are all activities that both support the local economy and provide recreational opportunities for residents and tourists alike.

The Albion Flats area is the hub of many of these activities. The potential loss of the Albion River Campground, harbor, and beach and river access areas could damage the local economy and reduce recreational opportunities. ACAB requests that the EIR address access to the Flats area during construction as well as access to Albion River North Side Road and the trail to the flats that is located at the north end of the bridge.

If Caltrans plans to purchase or otherwise acquire the Flats campground for use as a construction staging area, ACAB requests that the EIR address this use's impact on the Flats, on the Albion River, and on public access to the beach.

Transportation/Traffic/Public Services

Construction-related traffic delays are likely to be significant and can severely impact emergency response. ACAB is deeply concerned about potential delays to fire and medical response, not only for the emergency vehicles themselves but also for volunteer fire and medical personnel who need to get to those vehicles. These negative impacts to emergency response could result in increased insurance rates or even cancelled policies for affected homeowners.

Construction delays may also harm local businesses due to lost revenue. Restaurants, tourist lodgings, and retail businesses based in the Albion village could see business plummet because they're located in areas where construction delays access and/or causes noise and other disruptions. Facilities such as Schooner's Landing and the Albion Biological Field Station could be harmed. Delays will also have an economic impact on local commuter traffic, both for residents getting to work and for vehicles passing through the area.

Construction delays could also affect the availability, timeliness, and price of services such as propane deliveries, refuse collection, home-repair services such as electricians, and shipping and delivery services such as FedEx and UPS. ACAB requests that the EIR address this potential and suggest mitigation strategies.

Another aspect of community disruption deals with construction vehicles, ranging from heavy equipment to the vehicles used by construction workers. ACAB requests that the EIR address proposed parking areas for these vehicles as well as the environmental impact of those parking areas.

ACAB is also concerned about traffic patterns on roads that feed into Highway 1, including, but not limited to, Albion Ridge Road, Albion-Little River Airport Road, Spring Grove Road, and Albion River North Side Road. There will be a mix of heavy

trucks and passenger vehicles, bicyclists and pedestrians waiting in traffic on Highway 1, together with traffic entering and leaving the aforementioned roads. ACAB requests details on proposed traffic-control patterns relating to these roads.

Additionally, both Albion Ridge Road and Navarro Ridge Road are dead-end roads (or practically so), and ACAB expresses concerns that construction-related traffic delays could result in dangerous conditions in the event of fire. We request that the EIR address alternative evacuation routes for both roads in the event of fire.

Cumulative Impacts

It is ACAB's position that the Salmon Creek Bridge, Highway 1 widening in the Albion and Navarro Ridge areas, and Albion River Bridge projects be evaluated together for purposes of land use and planning. It is unclear to ACAB whether the Albion River Bridge project has been separated from the Salmon Creek Bridge project and adjacent proposed work on Highway 1. ACAB urges that the EIR for the Albion River Bridge project be prepared in context with adjacent proposed projects.

ACAB also urges that the Albion River Bridge project be evaluated in the context of other Caltrans projects planned for the Mendocino Coast, including but not limited to retrofits to bridges at Big River and Jack Peters Creek. If these projects take place concurrently, the impact on traffic, on the local economy, and on recreational opportunities will be significant.

Alternative Analysis

This is a significant project that will have extensive impacts to a large area. Highway 1 is a Rural Scenic Highway and its character should be maintained. In the end, ACAB requests an economic analysis of the lifetime cost of rehabilitation versus replacement of the Albion River Bridge, as well as of a "no build" alternative. ACAB urges that every consideration be given to alternatives that avoid or reduce the environmental effects of the project, including rehabilitation and a "no build" alternative, per CEQA Section 15126.6.

Again, we thank you for the opportunity to express our concerns and participate in this process.

Sincerely,

Jim Heid
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