

# Albion Bridge Stewards

*A working group of the Albion Community Advisory Board*

P.O. Box 363  
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By Electronic Mail and Facsimile  
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May 12, 2020

Chairman Van Konynenburg and Members  
California Transportation Commission  
Attn.: Mr. Mitchell Weiss, Executive Director  
1120 "N" Street  
Sacramento, CA 95814

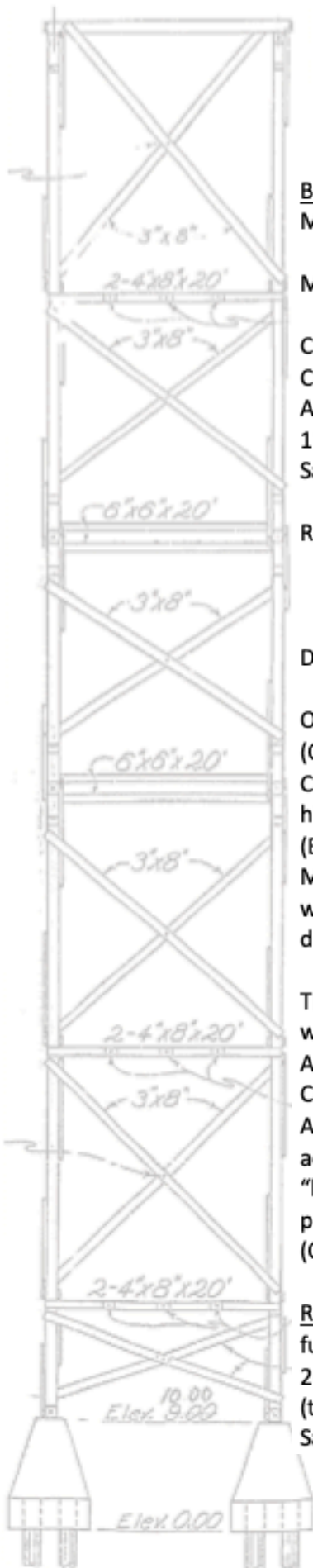
RE: LIST OF 2018 SHOPP LONG LEAD PROJECT AMENDMENTS AND  
2020 SHOPP PROJECT LIST, HIGHWAY 1, ALBION RIVER BRIDGE  
AND SALMON CREEK BRIDGE, MENDOCINO COUNTY

Dear Mr. Chairman and Commissioners:

Our review of the meeting materials for this week's California Transportation Commission (CTC) meeting indicates – as you and your staff have undoubtedly also noted – that Caltrans has once again bungled its work regarding both the state and federally listed historic(al) Albion River Bridge (Br. #10-0136) and the nearby Salmon Creek Bridge (Br. #10-0134, the Bridge) on rural, two-lane, low traffic volume Highway 1 in Albion, Mendocino County. In the process, Caltrans continues to misinform the Commission, waste taxpayer dollars, and propose both the unnecessary and highly environmentally destructive Albion River Bridge replacement and Salmon Creek Bridge replacement projects.

The projects – and the proposed CTC actions at the May 13, 2020 meeting – are located within the coastal zone and in parts federally funded. The U.S. Coastal Zone Management Act of 1972, as amended (16 U.S.C. 1421 et seq., CZMA) requires the CTC to obtain California Coastal Commission (CCC) concurrence in the requisite CTC (or US Federal Highway Administration) federal consistency certification/determination that the proposed CTC activity as a whole (including its SHOPP 2020 fund-programming and associated 2020 SHOPP "lead abatement" project fund-programming) is consistent, to the maximum extent practicable, with the federally approved California Coastal Zone Management Program (CCMP). Such CCC concurrence must precede CTC action.

Recommendation and Request. We therefore respectfully recommend and request, as further discussed below, that the CTC defer action on (1) the Salmon Creek Bridge "List of 2018 SHOPP Long Lead Project Amendments 1 01-Men-1 42.4/43.3 4491 010000055 41140" (the 2018 SHOPP Amendment Project), (2) the "V4.0 2020 SHOPP Project List Mendocino Salmon Creek Bridge replacement 01-Mendocino-1 42.4/43.3 4491 010000055 41140", and,



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(3) the "V4.0 2020 SHOPP Project List Mendocino Albion River Bridge replacement 01-Mendocino-1 43.3/44.2 4490 010000054", until:

- (a) Caltrans presents a complete (finite, internally consistent) project description and schedule, alternatives and feasibility analysis, preliminary environmental assessment, and CCMP consistency certification or consistency determination for these projects, and (b) proper public notice of the availability of these required documents and of CTC hearing in the area of the project has been given, with adequate time for public review and comment.
- (b) The CCC has performed its duties in relation to the CTC's consistency determination on these CTC activities, pursuant to the CZMA and the CCMP.

1. Salmon Creek Bridge 2018 SHOPP Amendment. The Caltrans 2018 SHOPP Amendment Project description, performance measures, schedule, and projected (not programmed) costs are variously erroneous, incomplete, and inconsistent with the V4.0 2020 SHOPP Project List Mendocino Salmon Creek Bridge replacement ("preservation") project 01-Mendocino-1 42.4/43.3 4491 010000055 41140" (the SHOPP 2020 Project List, at electronic page 272/608 of your May 13, 2020 board book).

(a) Caltrans represents to the CTC that the existing condition of 21,915.0 unspecified units of the Salmon Creek Bridge is "poor", whereas Caltrans rated the Bridge as having a "fair" condition in its 2018 Bridge Inspection report and has performed road deck maintenance in 2018-2019 that further supports that rating.

(b) Caltrans centrally relies in the proposed long-term rescheduling of the Salmon Creek on an undisclosed related "lead abatement" project ((EA 40141/PPNO 01-4753), which it proposes to subsequently slip piecemeal into the 2020 SHOPP, and thereby has presented a facially incomplete project description, schedule, and proposed costs for CTC programming, which denies the CTC the ability to perform its statutorily mandated comprehensive oversight function of Caltrans.

(c) The Caltrans 2018 SHOPP Amendment Project sets forth a five-to-eight-year delayed ("long lead") project schedule, through State Fiscal Year 2030, which is inconsistent in all five categories (PS&E, R/W Support, Construction Support, R/W Capital, and Construction Capital) with the SHOPP 2020 Project List that is also before the CTC for adoption at the May 13, 2020 meeting.

2. EA 40141/PPNO 01-4753. The Caltrans proposal to the CTC for funding-programming of the sandblast “lead abatement” project in the highly scenic and highly environmentally sensitive Salmon Creek Estuary, in lower Salmon Creek Valley, on the Salmon Creek bluffs and cliff, and on the Whitesboro Cove coastal bluffs involves unbalanced mass cut-and-fill grading, removal of extensive environmentally sensitive habitat areas, destruction or severe impairment of habitat for listed faunal and floral species, significant deterioration of air and water quality, substantial Highway 1 traffic disruptions during the economically significant coastal Mendocino visitor-recreational season, and extended elevated noise generation, among other likely direct and cumulative adverse effects. As with other Caltrans development in Albion, the project, under color of removing sandblast lead-zinc waste, will likely seek to perform impermissible piecemeal rough grading of natural and other protected coastal landforms for the bridge replacement project. Any action by the CTC for funding-programming this “lead abatement” scheme must therefore be based on a complete project description, full alternatives analysis, CCMP consistency analysis, and realistic project schedule and cost data.

3. V4.0 2020 SHOPP Project List: Salmon Creek Bridge.

(a) The SHOPP 2020 Project List contains prior Salmon Creek Bridge replacement cost allocations that are unsupported by the requisite CCMP consistency certification or consistency determination, and are therefore inconsistent with the requirements of the CZMA.

(b) The SHOPP 2020 Project List schedule (“milestones”) for Salmon Creek Bridge replacement PA&ED, R/W, RTL, and Begin Construction are inconsistent with the schedule therefor in the “List of 2018 SHOPP Long Lead Project Amendments”.

(c) The SHOPP 2020 Project List statement that the existing condition of 21,915.0 square feet of the Salmon Creek Bridge is “poor” is unsupported by substantial evidence and contrary to the Caltrans BIR (2018) on this bridge.

(d) The CTC should specify, by notation or reference (link), the meaning, terms, and conditions of the statement in the SHOPP 2020 Project List that “SB 1 baseline agreement [is] required”, and provide timely public notice of any such agreement, the comment period for, and hearing prior to any CTC action thereon.

4. V4.0 2020 SHOPP Project List: Albion River Bridge.

(a) The SHOPP 2020 Project List contains prior Albion River Bridge replacement cost allocations that are unsupported by the requisite CCMP consistency certification or consistency

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determination, and are therefore inconsistent with the requirements of the CZMA.

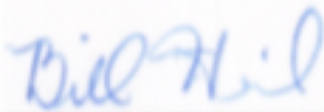
(b) The SHOPP 2020 Project List schedule of funded-programmed costs for Albion River Bridge replacement R/W, Construction, PA&ED, PS&E, R/W Support, and Construction Support, totaling \$93.908 million, reflect an infeasible project delivery schedule due to project mismanagement, numerous unresolved Coastal Act violations, the failure to produce a complete (finite) project description and a draft EIR/EIS, and the lack of any need for the project.

(c) The SHOPP 2020 Project List statement that the existing condition of 27,340.0 square feet of the Albion River Bridge is "poor" is unsupported by substantial evidence and contrary to the Caltrans BIR (2018) on this bridge.

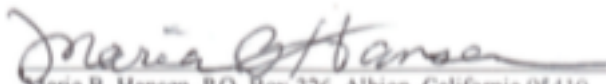
(d) The CTC should specify, by notation or reference (link), the meaning, terms, and conditions of the statement in the SHOPP 2020 Project List that "SB 1 baseline agreement [is] required", and provide timely public notice of any such agreement, the comment period for, and hearing prior to any CTC action thereon.

Thank you for this opportunity to comment on these matters.

Respectfully submitted on behalf of the Albion Bridge Stewards:  
(By authorized electronic signatures)



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