

Exhibit E

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From: [Spencer, Craig](#)
To: [Angelo, Philip](#)
Cc: [194-HCD-Secretary](#)
Subject: FW: BSBO info for upcoming Garrapata Bridge Railing hearing at the HRRB
Date: Thursday, December 1, 2022 9:50:12 AM
Attachments: [Collision_Summary_Analysis_R013250-111921_MON-001-60_to_67.pdf](#)
[SR-1_CHP_Accident_Data_Final.xlsx](#)
[Speedstudy05-MON-01-PM_62.97_Spot_Speed_Study_4.pdf](#)

From: Martha Diehl <mvdiehl@me.com>
Sent: Thursday, December 1, 2022 9:44 AM
To: Spencer, Craig <SpencerC@co.monterey.ca.us>
Subject: BSBO info for upcoming Garrapata Bridge Railing hearing at the HRRB

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Hi Craig,

I just received a request for some of the data collected by the Big Sur Byways committee on bridge railings that was posted on our website but which is no longer available online since the change in platform. The items requested were the speed study referenced in the EIR but not provided and the accident data referenced in the EIR. These documents were obtained from CALTrans via a public records request. I will attach them here so they can be included in the record and the discussion.

I will further attach an accident summary provided to BSBO by CHP in response to investigations about safety hazards on the Byway.

Please make sure these are provided to the planner, distributed to the HRRB and public, and made part of the administrative record for this project.

Thank you,
Martha

Martha Diehl
Chair, Big Sur Byways Organization

Traffic Accident Surveillance and Analysis System (TASAS) Crash Data Analysis Form

The contents of these reports shall be considered confidential and may be privileged pursuant to 23 U.S.C. Section 409 and are for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Do not print, copy or forward.

MON 1 PM 60 to 67

Table 4.1A summarizes collision rates for both northbound (NB) and southbound (SB) state route (SR) 1 mainline from postmile (PM) 60 to 67. The Table B report(s) were generated on 11/29/2021 and they depict existing collision rates per million vehicle miles for the most recent 11-year period from 1/1/2010 to 12/31/2020 from the Traffic Accident Surveillance and Analysis System (TASAS).

TABLE 4.1A
TASAS Table B Collision Rates (1/1/2010 – 12/31/2020)

Segment	TOTAL No. of Collisions	ACTUAL (per million vehicle miles)			AVERAGE (per million vehicle miles)		
		Fatal Collisions	Fatal + Injury Collisions	Total ⁽¹⁾	Fatal Collisions	Fatal + Injury Collisions	Total ⁽¹⁾
SR- 1 PM 60 to PM 67	156	0.021	0.49	1.09	0.035	0.61	1.30

⁽¹⁾ All reported collisions (includes Property Damage Only (PDO) Collisions)

Table 4.1A (TASAS Table B Collision Rates (1/1/2010 – 12/31/2020)) summarizes and compares the actual collision rates for the segment of SR-1 from PM 60 to 67 to the average rates for similar facilities throughout the State. The total collision rates include all reported collisions: Fatal, Injury, and Property Damage.

Analysis of the TASAS Table B records shows a total of 156 collisions within the segment of SR-1 from PM 60 to 67 and study periods summarized above, with a total rate of fatal related collisions that is below the average for similar facilities statewide, fatal and injury related collisions that is below the average for similar facilities statewide, and a total rate of collisions that is below the average for similar facilities statewide

Detailed analysis per the TASAS Selective Accident Retrieval (TSAR) generated on 11/29/2021 shows that the primary collision factors in the segment were:

- 48 "Improper Turn,"
- 39 "Speeding,"
- 27 "Other Violation,"
- 19 "Influence Alcohol,"
- 15 "Failure to Yield,"
- 6 "Other Than Driver,"
- 1 "Improper Driving," and
- 1 "Unknown"

The types of collision included:

- 44 "Hit Object,"
- 37 "Rear End,"
- 23 "Broadside,"
- 21 "Sideswipe,"
- 19 "Overturn,"
- 6 "Head-on,"
- 4 "Other," and
- 2 "Auto-pedestrian"

A review of TASAS Table C locations within PM 60 to 67 was completed and showed one Table C investigations. Table C identifies high collision frequency spot locations with either Type 'W' (Wet) collisions or Type 'A' (All) collisions where four or more significant collisions within twelve, six, or a three-month period have occurred. TASAS Table C reports were generated in April/2018 for the most recent three-year period, from 7/1/2013 through 06/30/2016. Within the segment length one Type 'A' traffic investigation was required with a recommendation of no action.

A review of HSIP Monitoring reports within PM 60 to 67 was completed and showed no HSIP Monitoring report. There were no required investigation locations.

Analysis Conducted By:

Name

Date



LIDAR MOTOR VEHICLE SPEED SURVEY FIELD TALLY SHEET



County: Monterey Route: 1 Postmile: 62.97

From: 05-MON-01-PM 62.97 Direction: Northbound

To: 05-MON-01-PM 62.97 Observer: Juan Lezo

ADT: XXXX Weather: Overcast

Posted Speed: 55 MPH Date: 11/19/2019 Day: Tuesday Time: 12:20 PM

Speed (MPH)	NUMBER OF VEHICLES																				Total
75																					
74																					
73																					
72																					
71																					
70																					
69																					
68																					
67																					
66																					
65	X																				1
64	X																				1
63																					
62																					
61																					
60	X																				1
59	X	X																			2
58	X	X	X																		3
57																					
56	X	X	X																		3
55	X	X	X	X	X																5
54	X	X	X																		3
53	X	X	X	X	X																5
52	X	X	X																		3
51	X	X	X	X																	4
50	X	X	X	X																	4
49	X	X	X	X	X																5
48	X	X	X	X	X	X															6
47	X	X	X	X																	4
46	X	X	X																		3
45	X	X																			2
44																					
43	X	X	X																		3
42	X																				1
41																					
40	X																				1
39																					
38																					
37																					
36																					
35																					
Total Number of Vehicles																					60

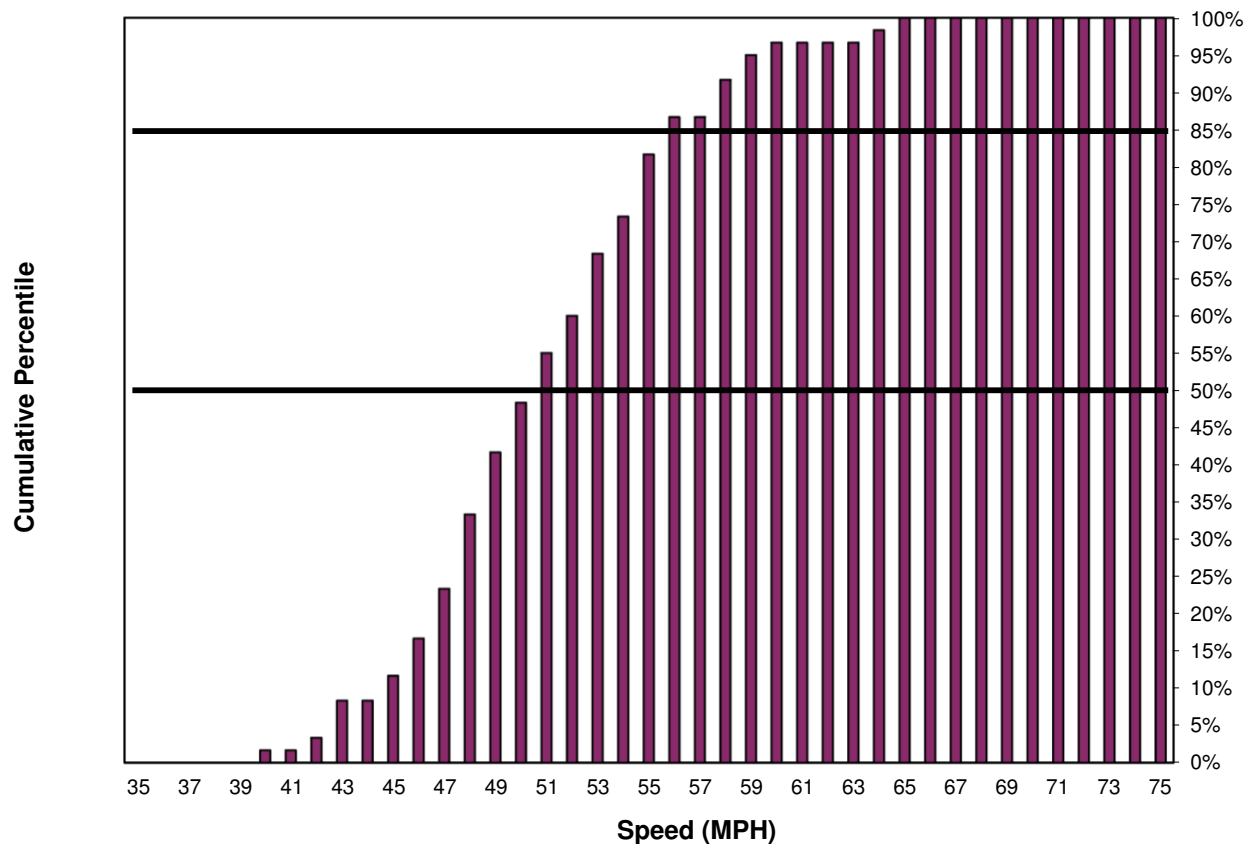


LIDAR MOTOR VEHICLE SPEED SURVEY FIELD TALLY SHEET



County: Monterey Route: 1 Postmile: 62.970
From: 05-MON-01-PM 62.97 Direction: Northbound
To: 05-MON-01-PM 62.97 Observer: Juan Lezo
ADT: XXXX Weather: Overcast
Posted Speed: 55 MPH Date: 11/19/2019 Day: Tuesday Time: 12:20 PM

Vehicle Frequency Curve



$S_{50th} =$ 51 MPH $S_{85th} =$ 56 MPH $S_{Ave} =$ 51 MPH
 $S_{Min} =$ 40 MPH $S_{Max} =$ 65 MPH $S_{Pace} =$ 46 to 55 MPH
% Obey Posted Speed = 82% % In Pace = 70%
Actual Collision Rate = XX per MVM Average Collision Rate = XX per MVM

Note: Collision Rate = Number of Collisions per Million Vehicle Miles Traveled



LIDAR MOTOR VEHICLE SPEED SURVEY FIELD TALLY SHEET



County: Monterey Route: 1 Postmile: 62.97

From: 05-MON-01-PM 62.97 Direction: Southbound

To: 05-MON-01-PM 62.97 Observer: Juan Lezo

ADT: XXXX Weather: Overcast

Posted Speed: 55 MPH Date: 11/19/2019 Day: Tuesday Time: 12:20 PM

Speed (MPH)	NUMBER OF VEHICLES																				Total
75																					
74	X																				1
73																					
72																					
71																					
70	X																				1
69																					
68																					
67																					
66																					
65	X	X																			2
64																					
63																					
62	X																				1
61	X																				1
60	X																				1
59	X																				1
58	X	X	X																		3
57	X																				1
56																					
55	X	X	X	X	X	X	X														7
54	X	X																			2
53	X	X	X	X	X	X															6
52	X	X	X	X	X																5
51	X	X																			2
50	X	X	X	X	X	X															6
49	X	X	X	X	X																5
48	X	X	X																		3
47	X	X	X	X	X																5
46	X																				1
45	X	X																			2
44	X																				1
43																					
42	X	X																			2
41	X																				1
40																					
39																					
38																					
37																					
36																					
35																					
Total Number of Vehicles																					60

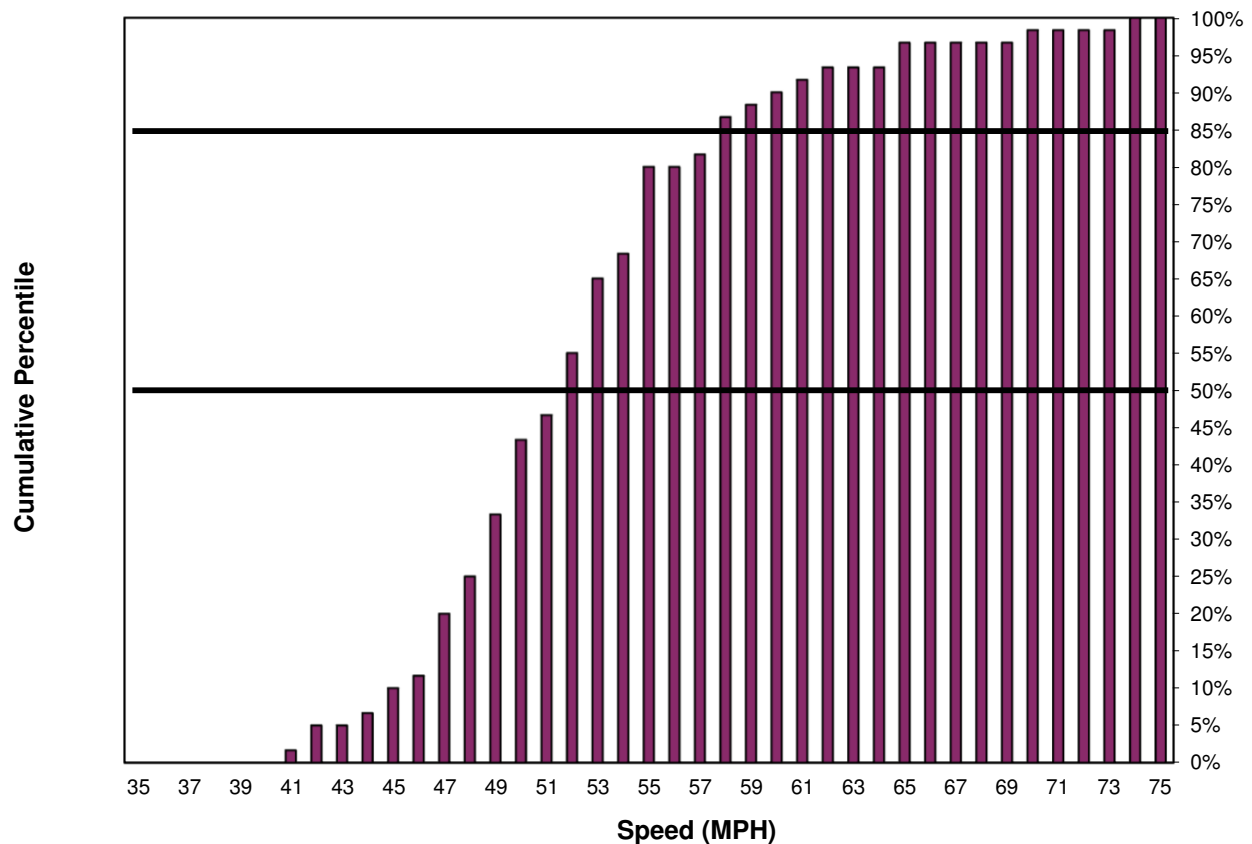


LIDAR MOTOR VEHICLE SPEED SURVEY FIELD TALLY SHEET



County: Monterey Route: 1 Postmile: 62.970
From: 05-MON-01-PM 62.97 Direction: Southbound
To: 05-MON-01-PM 62.97 Observer: Juan Lezo
ADT: XXXX Weather: Overcast
Posted Speed: 55 MPH Date: 11/19/2019 Day: Tuesday Time: 12:20 PM

Vehicle Frequency Curve



$S_{50th} =$ 52 MPH $S_{85th} =$ 58 MPH $S_{Ave} =$ 52 MPH
 $S_{Min} =$ 41 MPH $S_{Max} =$ 74 MPH $S_{Pace} =$ 46 to 55 MPH
% Obey Posted Speed = 80% % In Pace = 70%
Actual Collision Rate = XX per MVM Average Collision Rate = XX per MVM

Note: Collision Rate = Number of Collisions per Million Vehicle Miles Traveled



LIDAR MOTOR VEHICLE SPEED SURVEY FIELD TALLY SHEET



County: Monterey Route: 1 Postmile: 62.97

From: 05-MON-01-PM 62.97 Direction: Bi-Directional

To: 05-MON-01-PM 62.97 Observer: Juan Lezo

ADT: XXXX Weather: Overcast

Posted Speed: 55 MPH Date: 11/19/2019 Day: Tuesday Time: 12:20 PM

Speed (MPH)	NUMBER OF VEHICLES																				Total
75																					
74	X																				1
73																					
72																					
71																					
70	X																				1
69																					
68																					
67																					
66																					
65	X	X	X																		3
64	X																				1
63																					
62	X																				1
61	X																				1
60	X	X																			2
59	X	X	X																		3
58	X	X	X	X	X	X															6
57	X																				1
56	X	X	X																		3
55	X	X	X	X	X	X	X	X	X	X	X	X									12
54	X	X	X	X	X																5
53	X	X	X	X	X	X	X	X	X	X	X	X									11
52	X	X	X	X	X	X	X	X													8
51	X	X	X	X	X	X															6
50	X	X	X	X	X	X	X	X	X	X											10
49	X	X	X	X	X	X	X	X	X	X											10
48	X	X	X	X	X	X	X	X	X												9
47	X	X	X	X	X	X	X	X	X												9
46	X	X	X	X																	4
45	X	X	X	X																	4
44	X																				1
43	X	X	X																		3
42	X	X	X																		3
41	X																				1
40	X																				1
39																					
38																					
37																					
36																					
35																					
Total Number of Vehicles																					120

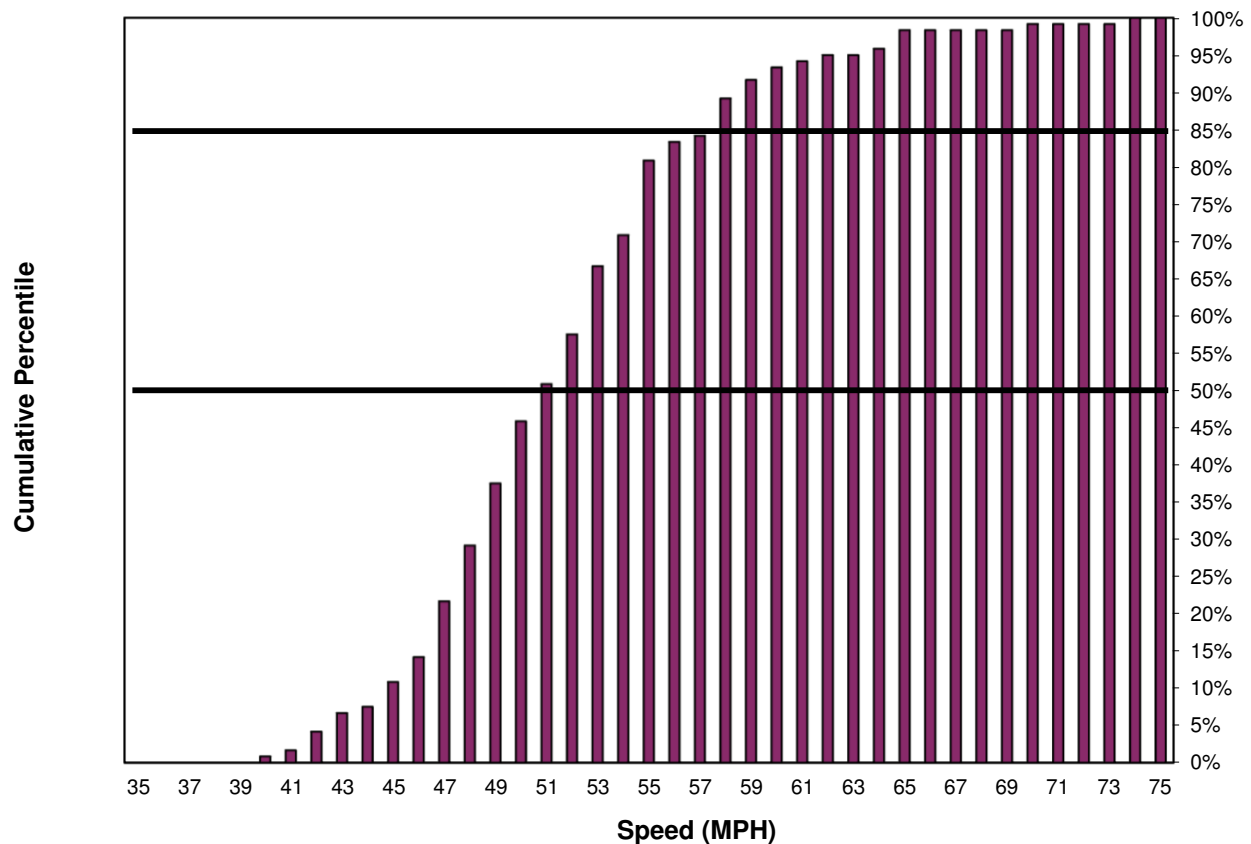


LIDAR MOTOR VEHICLE SPEED SURVEY FIELD TALLY SHEET



County: Monterey Route: 1 Postmile: 62.970
From: 05-MON-01-PM 62.97 Direction: Bi-Directional
To: 05-MON-01-PM 62.97 Observer: Juan Lezo
ADT: XXXX Weather: Overcast
Posted Speed: 55 MPH Date: 11/19/2019 Day: Tuesday Time: 12:20 PM

Vehicle Frequency Curve



$S_{50th} = 51 \text{ MPH}$ $S_{85th} = 58 \text{ MPH}$ $S_{Ave} = 52 \text{ MPH}$
 $S_{Min} = 40 \text{ MPH}$ $S_{Max} = 74 \text{ MPH}$ $S_{Pace} = 46 \text{ to } 55 \text{ MPH}$
% Obey Posted Speed = 81% % In Pace = 70%
Actual Collision Rate = XX per MVM Average Collision Rate = XX per MVM

Note: Collision Rate = Number of Collisions per Million Vehicle Miles Traveled

**2015 Crash Data on SR-1 near the
following areas:
Soberanes/Garrapata, Bixby
Bridge/Old Coast Road, Sycamore
Canyon Road, JP Burns State Park**

Complete/Incomplete	Collision Type	NCIC	Report Number	Collision Date	Collision Time	Officer	Beat	
Complete	PDO,	9730	9730-2015-0080	8/31/2015	20:10:00.0	20981	12	SR-1 at Sycamore Canyon Road
Complete	INJURY,	9730	9730-2015-0236	9/20/2015	17:30:00.0	20514	14	SR-1 north of Garrapata Ridge Road
Complete	PDO,	9730	9730-2015-0503	10/24/2015	10:00:00.0	017184	14	SR-1 south of Sycamore Canyon Road
Complete	PDO,	9730	9730-2015-0153	9/4/2015	13:00:00.0	017184	14	SR-1 at Bixby Bridge
Complete	PDO,	9730	9730-2015-3454	12/28/2015	13:15:00.0	019529	12	SR-1 just south of Bixby Bridge
Complete	INJURY,	9730	9730-2015-3399	12/21/2015	15:40:00.0	21009	14	SR-1 at Garrapata
Complete	PDO,	9730	9730-2015-0285	9/25/2015	17:45:00.0	20208	12	SR-1 just south of Sycamore Canyon Road

**2016 Crash Data on SR-1 near the
following areas:
Soberanes/Garrapata, Bixby
Bridge/Old Coast Road, Sycamore
Canyon Road, JP Burns State Park**

Complete/Incomplete	Collision Type	NCIC	Report Number	Collision Date	Collision Time	Officer	Beat	
Complete	PDO,	9730	9730-2016-0056	1/10/2016	21:21:00.0	21009	14	SR-1 just north of Bixby Bridge
Complete	PDO, H&R (	9730	9730-2016-3421	2/14/2016	15:49:00.0	20208	12	SR-1 Area of JP Burns State Park
Complete	PDO, H&R (	9730	9730-2016-3681	3/19/2016	17:25:00.0	020896	14	SR-1 just north of Old Coast Road
Complete	PDO, H&R (	9730	9730-2016-3690	3/20/2016	19:15:00.0	020933	14	SR-1 just north of Old Coast Road
Complete	INJURY,	9730	9730-2016-3763	3/26/2016	12:55:00.0	017184	14	SR-1 just south of Old Coast Road
Complete	PDO,	9730	9730-2016-3925	4/16/2016	16:05:00.0	017184	14	SR-1 at Sycamore Canyon Road
Complete	PDO, H&R (	9730	9730-2016-4009	4/23/2016	14:35:00.0	017184	12	SR-1 Area of JP Burns State Park
Complete	PDO,	9730	9730-2016-4038	5/1/2016	02:20:00.0	21009	12	SR-1 at Garrapata

Complete	PDO, H&R (	9730	9730-2016-3905	4/11/2016	00:00:00.0	018543 -	14	SR-1 at Old Coast Road
Complete	PDO,	9730	9730-2016-4160	5/2/2016	00:00:00.0	018543 -	12	SR-1 just south of JP Burns State Park
Complete	PDO,	9730	9730-2016-4266	5/25/2016	08:15:00.0	017502 -	14	SR-1 at Juan Higuera Creek Bridge
Complete	PDO,	9730	9730-2016-4230	5/22/2016	00:57:00.0	020990 -	14	SR-1 just south of Garrapata Creek Bridge
Complete	PDO,	9730	9730-2016-4290	5/26/2016	14:15:00.0	017184 -	14	SR-1 at Bixby Bridge
Complete	INJURY,	9730	9730-2016-4210	5/19/2016	21:35:00.0	020677 -	12	SR-1 just south of Garrapata
Complete	PDO,	9730	9730-2016-4344	5/31/2016	12:45:00.0	018543 -	14	SR-1 just south of JP Burns State Park
Complete	PDO, H&R (	9730	9730-2016-4552	6/23/2016	15:20:00.0	20208	12	SR-1 at Bixby Bridge
Complete	INJURY,	9730	9730-2016-4585	6/26/2016	17:55:00.0	20903	14	SR-1 just south of Sycamore Canyon Road
Complete	PDO,	9730	9730-2016-4710	7/11/2016	17:45:00.0	20841	12	SR-1 just north of JP Burns State Park
Complete	PDO,	9730	9730-2016-4833	7/26/2016	13:05:00.0	20903	14	SR-1 just south of Sycamore Canyon Road
Complete	PDO,	9730	9730-2016-4828	7/26/2016	01:36:00.0	21009	14	SR-1 at Pfeiffer Ridge Road
Complete	PDO,	9730	9730-2016-5470	9/27/2016	17:50:00.0	20903	14	SR-1 just south of Coast Road
Complete	INJURY,	9730	9730-2016-5531	10/2/2016	11:36:00.0	018543 -	14	SR-1 just north of Sycamore Canyon Road
Complete	PDO,	9730	9730-2016-5541	10/3/2016	08:41:00.0	018543 -	14	SR-1 just south of Garrapata
Complete	PDO,	9730	9730-2016-5621	10/13/2016	09:15:00.0	018820 -	14	SR-1 just south of Garrapata Creek Bridge
Complete	INJURY,	9730	9730-2016-5739	10/22/2016	13:33:00.0	017184 -	12	SR-1 just north of JP Burns State Park

**2019 Crash Data on SR-1 near the
following areas:
Soberanes/Garrapata, Bixby
Bridge/Old Coast Road, Sycamore
Canyon Road, JP Burns State Park**

Complete/Inc	Collision Ty	NCIC	Report Number	Collision Date	Collision Time	Officer	Beat	
Complete	PDO,	9730	9730-2019-00053	1/11/2019	11:04:00.0	021856 -	12	SR-1 just north of Pfeiffer Road
Complete	INJURY,	9730	9730-2019-00101	1/22/2019	14:10:00.0	019818 -	12	SR-1 in area of JP Burns State Park
Complete	PDO,	9730	9730-2019-00333	2/17/2019	19:53:00.0	020899 -	14	SR-1 at Bixby Bridge
Complete	PDO,	9730	9730-2019-00575	3/24/2019	13:55:00.0	019818 -	14	SR-1 at Sycamore Canyon Road
Complete	PDO,	9730	9730-2019-00724	4/12/2019	13:40:00.0	017184 -	14	SR-1 at Bixby Bridge
Complete	PDO,	9730	9730-2019-00757	4/16/2019	22:40:00.0	022129 -	14	SR-1 in area of JP Burns State Park
Complete	INJURY,	9730	9730-2019-01104	5/27/2019	21:20:00.0	020970 -	14	SR-1 at Garrapata
Complete	INJURY,	9730	9730-2019-01477	7/4/2019	12:15:00.0	019818 -	14	SR-1 just south of Garrapata Creek Bridge

Complete	INJURY,	9730	9730-2019-02209	9/17/2019	11:30:00.0	020578 -	14	SR-1 at Sycamore Canyon Road
Complete	PDO, H&R (	9730	9730-2019-02247	9/18/2019	14:00:00.0	020916 -	12	SR-1 in area of JP Burns State Park
Complete	INJURY,	9730	9730-2019-02414	10/2/2019	11:15:00.0	017184 -	14	SR-1 at Glen Oaks
Complete	PDO,	9730	9730-2019-02481	10/12/2019	12:55:00.0	017184 -	14	SR-1 at Sycamore Canyon Road
Complete	INJURY,	9730	9730-2019-02496	10/14/2019	01:45:00.0	022129 -	14	SR-1 at Pfeffier Big Sur Road
Complete	PDO,	9730	9730-2019-02915	11/29/2019	07:25:00.0	019022 -	14	SR-1 at Bixby Bridge
Complete	INJURY,	9730	9730-2019-03135	12/24/2019	23:40:00.0	22118	14	SR-1 just north of Pfeiffer Ridge Road

From: [Sara A. Clark](#)
To: [300-hrrbhearingcomments](#); [Lundquist, Erik](#)
Cc: [Christina McGinnis](#)
Subject: Request for Continuance//Comment Letter re Item 2
Date: Tuesday, January 3, 2023 1:51:24 PM
Attachments: [Historic Review Board Letter \(1.3.22\).pdf](#)

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Mr. Lundquist,

On behalf of Keep Big Sur Wild, I write to ask for a continuance of the January 5, 2022 Historic Resources Review Board hearing on the Garrapata Bridge Rail Replacement project. The agenda packet contains over 800 pages of materials related to this item, and many people have been unable to review because of the holidays. A short continuance to allow adequate review of the materials would be most appreciated.

In addition, please find attached correspondence concerning this item, as well as two video clips. Please confirm that you can access the videos and that they will be included in the project file.

https://drive.google.com/file/d/1pfHPob_ICCyIZIKzdePkD2nIP9QDDxEz/view?ts=63b4843a

 [IMG_3731.MOV](#)

Best,
Sara



Sara A. Clark
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Attorney
Clark@smwlaw.com

January 3, 2022

Via Electronic Mail Only

Chair John Scourkes
Historic Resources Review Board
County of Monterey Government Center
1441 Schilling Place
Salinas, CA 93901
Email: hrrbhearingcomments@co.monterey.ca.us

Re: Item 2: Garrapata Bridge Rail Replacement Project (PLN 220090)

Dear Chair Scourkes and Members of the Board:

This firm represents Keep Big Sur Wild (“KBSW”) in matters related to the proposed replacement of the bridge rails on Garrapata Bridge and other historic concrete arch bridges along the Big Sur Coast (“Bridge Rail Project”), and we submit these comments on their behalf. Keep Big Sur Wild is a group of residents concerned with protecting the scenic landscape, sensitive natural resources, and wild, rural character of the Big Sur coastal region. As you know, Cal Trans suggests replacing the bridge rails on six concrete arch bridges that are individually eligible for listing on the National Register of Historic Places, and that are contributing resources to the Carmel San Simeon Historic District, including the iconic Bixby Bridge. KBSW is deeply concerned about the Garrapata Bridge Rail Project’s impact on visual resources and its precedent-setting potential, as detailed below. We appreciate your Board’s questions and engagement on this important topic, and request a continuance of this item given that the Agenda packet and report was released to the public over the holidays and contain 880 pages of material.

There are four important issues that remain unaddressed with respect to the Bridge Rail Project. First, while the EIR prepared by Caltrans for the Garrapata Bridge Rail Project and the overall Bridge Rail Project recognizes a cumulatively significant aesthetic/visual impact that cannot be mitigated, the EIR fails to consider the ways in which approval of the Garrapata Bridge Rail Project will impact future consideration of rail replacement projects on the other bridges. Once a project approach and design is selected for the Garrapata Bridge, it will effectively set the standard for the other bridges.

KBSW agrees with the concerns noted in the Board's December 1, 2022 Staff Report ("Will the decision on the Garrapata bridge rails have a cumulative effect on all seven historic concrete arch bridges? Staff's analysis is that this issue is not clearly explained by CalTrans. It is staff's opinion that the decision on the Garrapata bridge rails can and will influence future decisions on bridge rails on the six other historic concrete bridges.")

Second, CalTrans prepared an EIR on both the Garrapata Bridge Rail Project and the broader Bridge Rail Project. However, the EIR is inadequate, and cannot be relied on in the County's consideration of the Garrapata Bridge Rail Project. Specifically, the EIR relies on incomplete studies that were not made available before its certification, such as a traffic safety study and other historic resource information and coordination.

Third, the available information is inconclusive at best with respect to the proposed design's impact on visual resources. The current structure provides good visibility for the traveling public to the scenic coastal resources adjacent to Garrapata Bridge, as see in Figure 1-10 of the EIR and in the two video clips submitted with this letter. The 86H Front Elevation Photo Simulation, provided as page 9 in Exhibit B to the December 1, 2022 Staff Report, appears to show some visibility through Garrapata Bridge to the scenic resources below. However, other models show that the smaller openings and the increase in bridge thickness appear to have a significant impact on the ability of the traveling public to view scenic coastal resources from Garrapata Bridge. See 86H North End Block Photo Simulation and 86H South End Block Photo Simulation, provided as pages 10 and 11 in Exhibit B to the December 1, 2022 Staff Report. In both of these simulations, taken from angles rather than perpendicular to the bridge railing, the view through the railing appears to be completely blocked, *eliminating* the view of coastal resources adjacent to Garrapata Bridge. Additional simulations, including video simulations comparing the current and proposed views of the traveling public, must be provided to thoroughly evaluate this issue. KBSW believes that such simulations would show a severe decrease or elimination in views through the bridge railing. This result would destroy a key aspect of the bridges' historic nature and conflict with the Big Sur Land Use Plan. See, e.g., Policy 2.2.5 ("Visual access should be emphasized throughout Big Sur as an appropriate response to the needs of visitors. Visual access to the shoreline should be maintained by directing future development out of the viewshed."); Section 3.2 ("the issue of visual resource protection is probably the most significant and far reaching question concerning the future of the Big Sur coast."); Policy 4.1.2.2 ("A principal objective of management, maintenance, and construction activities within the Highway 1 right-of-way shall be to maintain *the highest possible standard* of visual beauty and interest.") (emphasis added); Policy 6.1.4 ("Visual access should be protected for long

term public use.”). The County must request sufficient information from CalTrans to evaluate this issue before reaching a decision on the requested permits.

Fourth, CalTrans has failed to justify the necessity of the Bridge Rails Project for at least three reasons. The existing bridges are narrow and often congested due to tourist traffic. Traffic generally slows through these areas under current conditions, and a reduction in the speed limit approaching and over the bridges would seem to be both supportive of these on-the-ground conditions and without significant impact on overall speed. Additional evaluation of this issue is warranted, beyond the December 1, 2022 Staff Report’s brief comment that “the speed cannot/should not be reduced.”

Second, the MASH Standards only apply to new projects. As CalTrans explained in its August 15, 2022 Supplemental Application Information: “Newly adopted MASH standards have mandated that all *new* installations of roadside safety devices on high-speed roadways, including bridge railing, must meet a new higher standard for crash testing for all projects implemented.” However, the bridge rails are not a *new* installation, they are existing infrastructure that should be repaired, not replaced.

Third, the underlying safety need for compliance with MASH Standards has not been demonstrated. Available traffic and accident data appear to show little public safety risk from repairing the bridge rails in their current form. As best we can tell, no accidents have occurred on any of these bridge. The loss of these significant historic resources and visual access is not justified by an unnecessary desire to simply upgrade infrastructure because general standards have changed.

For these reasons, KBSW agrees with County staff that “defining the sole purpose of the project to be the preferred alternative, replacement of an existing rail with a new compliant rail, forecloses evaluation of a reasonable range of project alternatives as required by CEQA.” December 1, 2022 Staff Report, Exhibit A; *see also North Coast Rivers Alliance, et al. v. Kawamura* (2015) 243 Cal.App.4th 647. These alternatives—either reducing the speed limit at the bridges and/or recommending an exception to the MASH standard—must be more thoroughly evaluated.

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Thank you for your time and attention to these important issues.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Sara A. Clark

Encl.

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