

From: [Dallas, Mitch@DOT](mailto:Dallas,Mitch@DOT)
To: 293-pchearingcomments
Cc: [Yu, Carla M@DOT](mailto:Yu,CarlaM@DOT); [Wilson, Michelle@DOT](mailto:Wilson,Michelle@DOT); [Spencer, Craig](mailto:Spencer,Craig); [Angelo, Philip](mailto:Angelo,Philip); [Magana, Sophia](mailto:Magana,Sophia); [Wilkinson, Jason J@DOT](mailto:Wilkinson,JasonJ@DOT)
Subject: Monterey County Planning Commission Item 3 PLN220090 Garrapata Bridge
Date: Tuesday, March 7, 2023 9:07:47 AM
Attachments: [Garrapata PLN220090 MonCo Planning Comm.pdf](#)

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Dear Chair Monsalve:

Please see the attached letter to the Monterey County Planning Commission regarding PLN220090 (Caltrans Garrapata Creek Bridge Railing Replacement), which is Item #3 on the agenda for tomorrow's Planning Commission meeting. Please do not hesitate to reach out to me with any questions or for further discussion.

Thanks,
Mitch

Mitch Dallas
Senior Coastal Resources Specialist
Caltrans District 5
805-748-7004

California Department of Transportation

CALTRANS DISTRICT 5
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415
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March 6, 2023

Etna Monsalve, Chair
Monterey County Planning Commission
168 W. Alisal St.
Salinas, CA 93901

Subject: PLN220090 Caltrans Garrapata Creek Bridge Railing Replacement Project
(Item No. 3) on March 8, 2023 Planning Commission Agenda

Dear Chair Monsalve and Planning Commissioners:

As the applicant for the California Department of Transportation (Caltrans) Combined Development Permit for the Garrapata Creek Railing Replacement Project (PLN220090), I would like to highlight information relative to this important Highway Safety project and dispel misinformation brought forth during the project's California Coastal Act implementation. Caltrans is completely aware of, and has addressed, the concerns about this highway bridge relative to the necessary maintenance associated with keeping the structure functioning in a manner that is context sensitive and safe for the traveling public and the movement of essential goods and services.

There are concerns that a standard approach to replacement of the failing bridge rails has been taken. The Planning Commission and members of the public believe that non-standard approaches to bridge rail repair and or replacement are called for in this case. Caltrans completely agrees and assures you that a non-standard approach has been taken in the development of this custom rail design. The custom Type 86H rail design was developed specifically for the Garrapata Creek bridge to best match the aesthetic and historic values that we all cherish. Caltrans has gone to great lengths to develop the Type 86H (H=historic) rail to suit the need of the Garrapata Creek crossing while preserving the visual experience and necessary safety. Every possible viable design option in this context has been explored.

Public input into the design was a key goal and factor in the rail type design. To achieve public participation and community support of a rail design of such importance, Caltrans developed an Aesthetic Design Advisory Committee (ADAC) tasked with providing input on the design and aesthetic of the replacement rail. Several (six) well attended ADAC meetings were held to provide input into the design

and the ultimate selection of the Type 86H railing. The ADAC was provided alternatives that included the required safety parameters for the existing speeds, facility type and structure type (two lane Hwy creek crossing). Both the Type 86H and the Texas C412 rail types were evaluated by the ADAC. The ADAC voted the Type 86H as the preferred option that meets the aesthetic and historic look. The Type 86H rail had the required crash testing and analysis to ensure the safety of the Design. Design details were incorporated at the request of the ADAC that best achieves the historic aesthetic matching the original 1931 rail as close as possible. Concrete structures from this 1930's era, especially with coastal weather influence, do not last forever and ultimately require replacement. The inevitable rail replacement was identified in the Big Sur Coast Highway Management Plan and included clear direction that the replacement rail match as close as possible as opposed to replicate. The rail design and rail replacement project before you accomplish just that. To provide further evidence of this, the following authorities and recommending bodies concur with the process and/or approve of the design and replacement project.

The California State Historic Preservation Office (SHPO) concurred with the Caltrans proposed Memorandum of Agreement (MOA), which was executed in March of 2021. The execution of the MOA concluded the Section 106 process, and the project is fully compliant with the National Historic Preservation Act. Consultation has been prepared and included in the project's EIR. The Monterey County Historic Resources Review Board voted unanimously to approve the rail design and replacement project during a well-attended January 25th, 2023 meeting. The Big Sur Land Use Advisory Committee voted to approve the rail replacement project during the November 8th, 2022 meeting

The Planning Commission, some members of the public, as well as Coastal Commission staff have provided public comment with the belief that Caltrans is able to "replicate" the existing bridge railing design if a design exception can be made by Caltrans and/or if the speed limit could be reduced on State Route 1 to 45 mph or less. In fact, under all circumstances, Caltrans is unable to replicate the existing rail. The existing railing is damaged beyond repair and there is no solid foundation remaining for repairs. In modern times, a rail with a 10" wide opening is not a viable option because it proven to be unsafe. The maximum allowable width of the openings on a Highway rail for this type of facility is 6" as defined by Federal Highway Administration (FHWA), the American Association of Highway and Transportation Officials (AASHTO) and the State of California. The design specifications required to meet these standards were established to prevent or minimize the loss of life and property by the public traveling along State Route 1. Modern vehicle characteristics have gone through extensive testing and analysis to determine the design parameters required for safety. Due to these facts, a reduction in speed will not resolve any of the subtle aesthetic changes with the Type 86H rails.

Garrapata Creek Bridge Railing Replacement Project
(Combined Development Permit No. PLN220090)
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We respect the County's, the community's and traveling public's value of the Garrapata Creek Bridge. Caltrans values this resource equally and that is exactly why considerable time and effort has been invested in meeting the mark required of this project. Considering the facts surrounding this important context sensitive safety project before you, we ask that the motion to deny the project be reconsidered and that the Planning Commission approve the project.

Sincerely,

Mitch Dallas

Mitch Dallas
Senior Coastal Resources Specialist
Caltrans, District 5

From: [Dallas, Mitch@DOT](mailto:Dallas,Mitch@DOT)
To: [293-phearingcomments](#)
Cc: [Yu, Carla M@DOT](mailto:Yu,CarlaM@DOT); [Wilson, Michelle@DOT](mailto:Wilson,Michelle@DOT); [Spencer, Craig](#); [Angelo, Philip](#); [Magana, Sophia](#); [Wilkinson, Jason J@DOT](#)
Subject: Monterey County Planning Commission Item 3 PLN220090
Date: Tuesday, March 7, 2023 9:22:32 AM
Attachments: [PLN220090 PC Mon Co garrapata pwp.pdf](#)

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Dear Chair Monsalve:

Please also see the attached presentation to the Monterey County Planning Commission regarding PLN220090 (Caltrans Garrapata Creek Bridge Railing Replacement), which is Item #3 on the agenda for tomorrow's Planning Commission meeting. Please do not hesitate to reach out to me with any questions or for further discussion.

Thanks,
Mitch

Mitch Dallas
Senior Coastal Resources Specialist
Caltrans District 5
805-748-7004



Planning Commission
Monterey County
March 8, 2023

Combined Development Permit No. PLN220090
Mitch Dallas, Senior Coastal Resources Specialist

<https://dot.ca.gov/caltrans-near-me/district-5/district-5-current-projects/05-1h800>



Purpose and Need

Project Purpose

This project proposes to upgrade the existing nonstandard bridge railing to current standards in order to ensure the safety and reliability of Highway 1.

Project Need

The reinforced concrete barrier rail posts have deteriorated along 75% of the left and right barrier rail lengths. Severe cracking with unsound concrete and spalls with exposed rusted rebar have been documented in the Bridge Inspection Reports.

Considerations

- Existing railing was constructed in 1931 and is damaged beyond repair as determined by Caltrans' Headquarters Division of Maintenance-Office of Structure Maintenance and Investigations.
- New railing must meet modern safety standards for modern vehicle size, weight and speed in addition to safety requirements for bikes and pedestrians.
- District Traffic Safety Engineers are unable to request a design exception or recommend a reduction in speed limit.
- Considerable public concern about the bridge.

Existing photos of the Garrapata Creek Bridge







Why does the replacement rail need to be built to modern safety standards?



Popular 1930's era vehicle



Popular 2020's era vehicle



Safety for Millions of People

Environmental Protection Environmental Protection



Design Constraints

The existing rail is damaged beyond repair. There is no solid foundation for repair.

Since the open windows in baluster-style rails can be “catch points,” where vehicles’ bumpers can potentially catch on the rails, which could cause or worsen accidents, current safety standards require a higher base height, thickness, and top rail thickness to accommodate modern vehicle designs, weights and existing speeds.

A **speed zone survey** specific to the Garrapata Creek Bridge was completed in December 2019. The survey resulted in 85% of the surveyed vehicle speeds being above the posted 55 MPH speed limit. The 85th percentile speed does not allow for Caltrans to reduce the speed limit. The traffic analysis determined that reducing the speed limit could not be justified and replacing the rail in-kind would not meet the safety requirements for the posted speed limit.



Environmental Concerns

- Garrapata Creek Bridge is eligible for the National Register of Historic Places and is a ***contributing*** resource of the Carmel-San Simeon Highway Historic District.
- Highway 1 in Big Sur is designated as an All-American Road and State Scenic Highway.
- Maintenance of Highway 1 in Big Sur is guided by the Big Sur Coast Highway Management Plan.
- Visual & historic resources

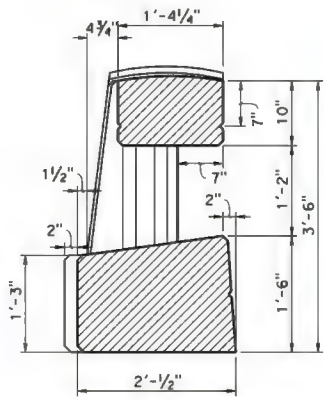
Proposed Design

- Over the past two and a half years, Caltrans has conducted extensive public outreach including formation of an **Aesthetic Design Advisory Committee (ADAC)** to solicit additional detailed input from the public and professionals in historic preservation during **6 design specific ADAC meetings**.
- CEQA/NEPA review, Section 4(f) Evaluation, Section 106 Consultation with the State Historic Preservation Officer (SHPO), & Tribal Consultation have been completed.
- The **custom designed** Type 86H rail has been selected for this specific bridge. Based upon the design safety requirements, environmental impact analysis, public and professional input.



Comparison of Existing Rail Dimensions with Proposed

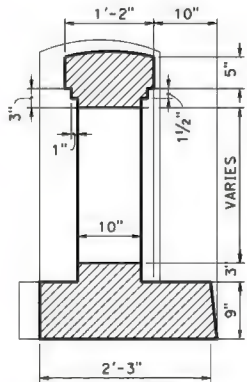
Element	Original Rail (in inches)	Type 86H (in inches)	Change in Appearance
Rail height	42"	42"	None
Arch window height (to top of arch)	20"	15.125" at traffic face of baluster; 16.125" at back side of baluster	Reduction in arch window height by 4.875" at traffic face & 3.875" at back side
Arch window width	10" (squared edges)	6" (1.5" chamfered edges to increase view through window)	Reduction in arch window width by 4"
Baluster length (parallel to traffic)	6"	6"	No change
Baluster width (depth) transverse to traffic	5"	7.5"	Increase in baluster width by 2.5"
Base height of curb at traffic face	9"	18"	Increase in base height by 9"
Base width (depth) of baluster rail on bridge	21"	24.5"	Increase in base width by 3.5"
Height at base of arch windows (above bridge deck/Finish Grade [FG])	12"	18"	Increase in height of base at arch windows by 6"
Top rail height	9"	10"	Increase in top rail height by 1"
Top rail width (depth) transverse to traffic	10"	16.25"	Increase in top rail thickness by 6.25"



TYPE 86H SECTION



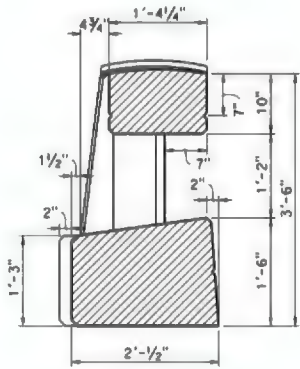
TYPE 86H ON DECK VIEW



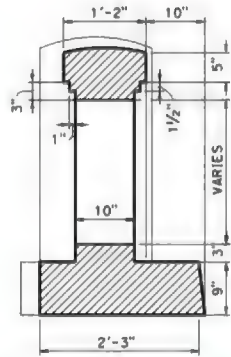
EXISTING SECTION



EXISTING ON DECK VIEW

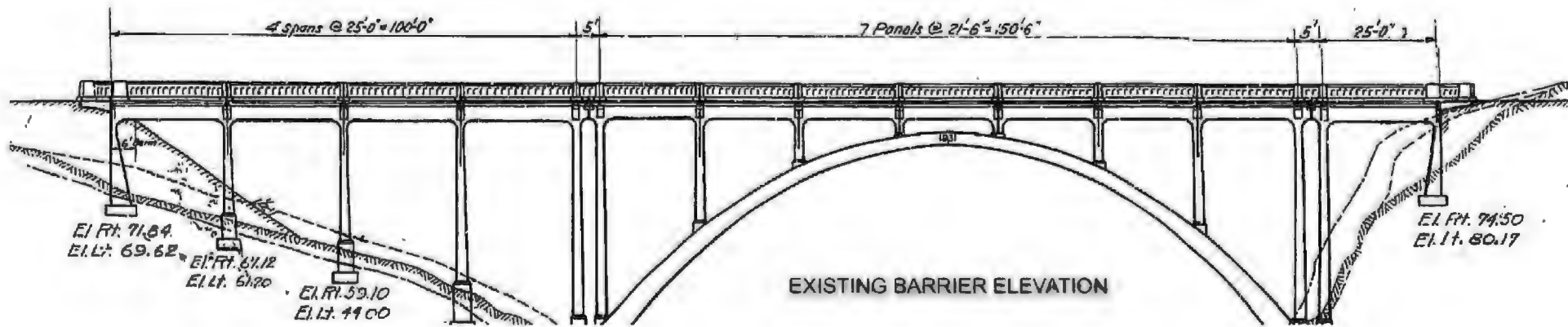
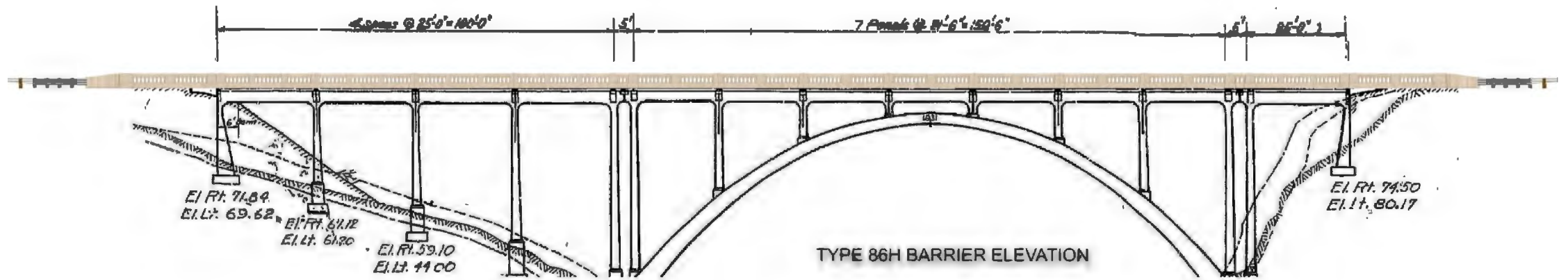


TYPE 86H SECTION



EXISTING SECTION







86H NORTH END BLOCK PHOTO SIM.



86H SOUTH END BLOCK PHOTO SIM.

Mitigation Measure Examples

- Stipulations of the Memorandum of Agreement with the SHPO:
 - Historic American Building Survey/Historic American Engineer Record/Historic American Landscape Survey (HABS/HAER/HALS) documentation in coordination with National Park Service (NPS).
 - DPR 523 Inventory Forms for all 7 Big Sur Arch Bridges (Big Creek, Bixby Creek, Rocky Creek, Garrapata Creek, Granite Canyon, Malpas Creek, & Wildcat Bridge) focusing on their specific historic design context.
 - Lesson plan for elementary school aged students.
 - Interpretive website
- Applicable measures for biological resources & air quality/GHG emissions; and Traffic Management Plan.



From: [Jim Heid](#)
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Subject: ABS LETTER TO MONTEREY COUNTY PLANNING COMMISSION (ITEM 3, MEETING OF MARCH 8, 2023 [CALTRANS])
Date: Tuesday, March 7, 2023 10:00:30 PM
Attachments: [ABSltr,MonCoPC,GarrapataBr,20230307.pdf](#)
[ComparativeAn,6BigSurBridges,R-Bs,q.pdf](#)
[DRAFT,Exh2,ComparAn, GarrapataBr,HistR+B, CT-86H,C412.png](#)

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Please find attached three documents: a letter from Albion Bridge Stewards regarding Item 3 (Caltrans), being heard at the March 8 Monterey County Planning Commission meeting, and two supporting exhibits.

Sincerely,
Jim Heid
Albion Bridge Stewards



Albion Bridge Stewards

A working group of the Albion Community Advisory Board

P.O. Box 363
Albion, CA 95410

By Electronic Mail

pchearingcomments@co.monterey.ca.us

March 7, 2023

Hon. Etna Monsalve, Chair, and Members
Monterey County Planning Commission
168 West Alisal Street
Salinas, California 93901

RE: PC 23-017 (PLN220090) - Garrapata Creek Bridge Balustrade Project
(Federally Co-funded Caltrans Development in the Coastal Zone Near
Coast Highway 1 [05-MON-01], PM 63.0)

Dear Madam Chair and Commissioners:

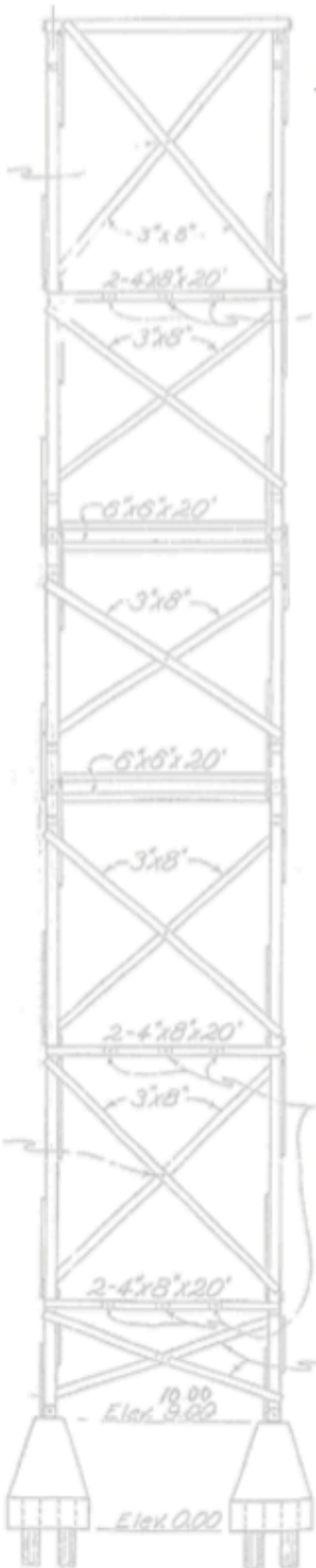
Thank you for your preliminary determination last month to deny Caltrans' piecemeal and Big Sur LCP-inconsistent Garrapata Creek Bridge balustrade (railings-balusters) project in the Carmel-San Simeon State Highway Historic District and in the California coastal zone.

Caltrans District 5 has disclosed that this is one of six essentially similar, federally co-funded Big Sur bridge projects; we note, in addition, that other Caltrans Districts have proposed similar bridge balustrade projects, including, but not limited to, by District 1 at the federally and state listed historic Albion River Bridge in a designated highly scenic area of coastal Mendocino County. Your action on this Caltrans project is thus of regional, statewide, and national significance.

For the reasons set forth below and in the testimony to the Planning Commission on February 22, 2023 by Albion Bridge Stewards Ali van Zee and Annemarie Weibel, we respectfully recommend *and request* your formal action - on the basis of fully articulated findings of fact and law on the record of your proceedings - to deny that application (Agenda Item 3) at tomorrow's Planning Commission meeting. By these comments, we identify some of these significant LCP inconsistencies for your consideration.¹

1. Our comments are timely pursuant to (a) the Ralph M. Brown Act, which for its purposes classifies the Planning Commission as a "legislative body" (Gov't Code §§ 54952(b), 54954.3(a) ["Every agenda for regular meetings shall provide an opportunity for members of the public to directly address the legislative body on any item of interest to the public, before or during the legislative body's consideration of the item, that is within the subject matter jurisdiction of the legislative body"], and, (b) the California Coastal Act of 1976 (Pub. Res. Code § 30006 ["the public has a right to fully participate in decisions affecting coastal planning, conservation, and development; that achievement of sound coastal conservation and development is dependent upon public understanding and support; and that the continuing planning and implementation of programs for coastal conservation and development should include the widest opportunity for public participation"]).

Website: <http://albioncab.wordpress.com>
Email: acab@mcn.org



Hon. Etna Monsalve, Chair, and Members
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1. Introduction. The Albion Bridge Stewards are a volunteer community association, organized in 2017, to preserve (a) the federally and stated-listed historic, 969 foot long, and to 140 foot high, iconic timber Albion River Bridge that carries Coast Highway 1 across the wild and scenic Albion River in the Mendocino County LCP-designated highly scenic coastal zone, and (b) the highly scenic and sensitive coastal environment. We are agriculturalists, artists, business owners, conservationists, educators, environmentalists, preservationists, professionals, retirees, students, teachers, and workers in Mendocino County, California, the United States, and other countries. The Albion Bridge Stewards are also co-founders of the Coast Highway Alliance.

2. Background. Garrapata Creek Bridge (05-Mon-01, Bridge Number 44-0018, PM 63.0, constructed in 1931) is one of the six arch bridges in the Carmel-San Simeon State Highway Historic District; the five other bridges in it are the Bixby Creek Bridge (05-Mon-01, Bridge Number 44-0019, PM 59.4, constructed in 1932); Rocky Creek Bridge (05-Mon-01, Bridge Number 44-0036, PM 60.0, constructed in 1932); Granite Canyon Bridge (05-Mon-01, Bridge Number 44-0012, PM 64.03, constructed in 1932); Malpaso Creek Bridge (05-Mon-01, Bridge Number 44-0017, PM 67.9, constructed in 1935); and Big Creek Bridge (05-Mon-01, Bridge Number 44-056, PM 28.1, constructed in 1938). In total, these six bridges are graced by nearly one mile (\pm 5,166 lineal feet) of classic balustrades, consisting of horizontal railings and vertical balusters, that afford bicyclists, motorists, and pedestrian traveling on these bridges irreplaceable public views to and along the Big Sur's state- and federally-protected critical viewshed. Exhibit 1 contains our preliminary analysis of the existing balustrades (railings and balusters) of the Garrapata Creek Bridge and its five companion bridges.

Successful legislation by esteemed State Senator Fred S. Farr (Carmel and Lucia) in 1965 designated this segment of the Coast Highway as California's first State Scenic Highway. Fred Farr, while serving as a California Coastal Zone Conservation Commissioner in 1973-1976, was instrumental in the State Legislature's declaration and finding that "the permanent protection of the state's natural and scenic resources is a paramount concern to present and future residents of the state and nation." (Pub. Res. Code § 30001(b).) The Coastal Commission-certified Big Sur LCP - which has also been incorporated by the federal government into the California Coastal Management Program that provides additional layers of review for federal transportation project funding to and implementation by Caltrans - implements that practical vision through the LCP's keystone critical viewshed policy and related standards. Six years ago, the Legislature enacted the "Road Repair and Accountability Act of 2017" (SB 1, codified as Chapter 5, Statutes of 2017), which directed Caltrans to focus on "fix-it-first transportation projects" to repair roads and bridges, expand the economy, and protect natural resources.

3. Caltrans Proposes Two "Barrier Types" to "Replace", Rather than Repair and Maintain, the Existing Garrapata Creek Bridge Balustrades. The record before the Planning Commission on the subject Caltrans CDP application contains no inventory of the Garrapata Bridge's railings and balusters that - for lack of prior maintenance and repairs - now require restoration (or, in some relatively small number of illustrative instances, perhaps replacement). Instead, Caltrans piggy-backs its proposal to altogether remove all of the existing Bridge balustrades and install substantially intensified new Bridge balustrades on the basis of a federal bureaucratic requirement that to obtain federal co-funding of the project, the bridge balustrades must be designed to meet current design standards that were developed by the highway lobby to sell more concrete and steel, but specifically not with the preservation of eligible historic bridges,

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Hon. Etna Monsalve, Chair, and Members
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to protect (e.g.) the public's Big Sur critical viewshed. Caltrans' characterization of its proposed Garrapata Creek bridge barrier project as "replacement" of the existing historic (1931) balustrade architecture constitutes a misrepresentation, as Exhibit 1 and Exhibit 2 demonstrate - and as the County staff report also notes.

Caltrans has presented photo-simulations "Barrier Types" 86H and/or C142 to the Planning Commission as its proposed "replacement" railings and balusters on the Garrapata Creek Bridge. Exhibit 2 juxtaposes Caltrans' contrived illustrations (of only one segment of the proposed balustrades, from an undisclosed elevated view origination point) of these two out-of-context, visually disruptive obstacles *with* a slightly oblique (2015) aerial image that shows the visually open spacing of the existing vertical (baluster) and horizontal (railing, base) elements of both the seaward (foreground) and landward (background) sides of the Garrapata Creek Bridge. Comparison with the visually open balustrades depicted *in full* on all six Big Sur bridges in Exhibit 1 identifies the extent to which Caltrans' proposed "Barrier Types" 86H and/or C142 would substantially impede and disrupt the public's views of the Big Sur critical viewshed while transiting the Garrapata Creek Bridge and/or the other five companion bridges.

Exhibit 2, Table 1 analyzes the dimensional impediments to those public views of the Big Sur critical viewshed, both seaward and landward of the roadway, while transiting the Garrapata Creek Bridge for both the "Type 86H" barrier and the "Type C412" barrier in comparison to the existing Bridge balustrade.

(a) The height and width of the approximately 328 arch windows in the Garrapata Creek Bridge balustrade constitute the frame through which especially the motoring public in cars perceives the foreground and mid-ground of the critical viewshed beyond and downslope from the Bridge.² Respectively, Barrier Type 86H reduces these balustrade portals by 26.3% in height and 40% in width, while raising the view-blocking baluster base height by 100% and the view-constraining baluster width by 33.3%, baluster base depth by 140%, and baluster depth by 40%. Although Barrier Type 86H retains the elevation of the top of the horizontal railing above the roadway, it increases the railing element height by 11.1% and its depth by 25%, thereby further foreshortening the available public views of the critical viewshed.

(b) Respectively, Barrier Type C412 reduces these balustrade portals by 31.6% in height and 42.5% in width, while raising the view-blocking baluster base height by 100% and the view-constraining baluster width by 20.8%, baluster base depth by 90%, and baluster depth by 100%. Although Barrier Type C412 also retains the elevation of the top of the horizontal railing above the roadway, it increases the railing element depth by 45.8%, while reducing the horizontal railing element height by 33.3%.

Thus, Caltrans' proposed barrier types 86H and C412 are not similar to the original (existing) Garrapata Bridge balustrades, but as a result of the reduced height and width of each frame, in combination with the view blockage and shading effects of wider and deeper balusters, substantially reduce the windows on the Big Sur critical viewshed that each frame, and all the frames en echelon, afford the traveling public.

Further, as shown on exhibit 2, the design of the new - rather than "replacement" - bridge barriers is inconsistent with the character of the existing Garrapata Creek Bridge and does not
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Hon. Etna Monsalve, Chair, and Members
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complement the visual character of the rural coastal setting. The new barriers do not match the existing visual character of the bridge and on their face do not match the texture and colors of the adjacent topography and terrain. The County staff report for the project also does not depict or analyze the effect(s) of the upcoast and downcoast “end blocks” and other guard rail structures, associated with the bridge balustrades, on the critical viewshed.

Caltrans’ sole mitigation measure for both barrier types is to stain them with an out-of-context brown-grey color, which serves as a result of shadows and the aforementioned spatial diminution to emphasize rather than offset the view-blocking effects of the proposed barrier types 86H and/or C412. Cumulatively, the impact of either barrier type on blockage of the critical viewshed through the circa 328 existing arch windows in the Garrapata Creek Bridge is significant along both sides of its ±285 foot length (±570 foot balustrade length); along the ±5,166 foot balustrade length of all six subject Big Sur bridges, the impact is increased at least by a factor of 9 (and likely more, given the substantially larger open downslope expanses visible through the existing arch windows on the Bixby Creek Bridge (Exhibit 1, page 2 of 6), the Rocky Creek Bridge (Exhibit 1, page 3 of 6), the Granite Canyon Bridge (Exhibit 1, page 4 of 6), and the Big Creek Bridge (Exhibit 1, page 6 of 6).

The project thus has an unmitigated significant adverse effect on the environment, which the alternative bridge balustrade repair and maintenance project would avoid.

4. The Caltrans Project is Inconsistent with the Mandatory Standards of the Big Sur LCP and As a Result Requires to be Denied.

(a) The keystone policy of the Big Sur LCP (land use plan) (Policy 3.2.1.) recognizes the Big Sur coast’s outstanding beauty and its great benefit to the people of the State and Nation, and declares the County’s objective to preserve these scenic resources in perpetuity and to promote the restoration of the natural beauty of visually degraded areas wherever possible. To this end, it is the County’s policy to prohibit all future public or private development visible from Highway 1 and major public viewing areas (the critical viewshed). The Caltrans Garrapata Creek Bridge barrier project is clearly visible from Highway 1, constitutes a public road construction project, is located in the critical viewshed (LCP Policy 3.2.2.1), constitutes enlargement of central bridge balustrade elements that increases the visibility of the structure (LCP Policy 3.3.3.A.7), and does not preserve the critical viewshed, and the LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B [“In order to grant any Coastal Development Permit, the findings of the Appropriate Authority shall be: ... 3) The subject project is in conformance with the Monterey County Local Coastal Program.”]).

(b) LCP Policy 3.2.3.B.1 provides that development applications shall require onsite determination, whether the development would intrude into the critical viewshed, through photographic superimposition of the extent of the proposed development. The standard for review is the objective determination of whether any portion of the proposed development is visible from Highway 1. Visibility will be considered in terms of normal, unaided vision in any direction. Exhibits 1 and 2 -- as well as Caltrans’ own photo simulation of the two barrier types, its contrived photo perspective notwithstanding -- document that (1) the proposed baluster and railing elements are visible from Highway 1, and (2) each of them intrudes as a result of its enlargement into the critical viewshed. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

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(c) LCP Policy 3.2.5.C provides that road capacity, safety and aesthetic improvements shall be allowed ..., provided they are consistent with Section 4.1.1, 4.1.2, and 4.1.3.

Policy 4.1.1. provides that Monterey County will take a strong and active role in guiding the use and improvement of Highway One and land use development dependent on the highway. The County's objective is to maintain and enhance the highway's aesthetic beauty. As Exhibits 1 and 2 demonstrate, Caltrans' proposed new Garrapata Creek Bridge barriers neither maintain nor enhance the highway's aesthetic beauty, but instead by substantially reducing the public portals to the adjacent critical viewshed significantly diminish it. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

Policy 4.1.2. provides, in relevant parts, that (1) improvements to Highway 1 shall be undertaken in order to increase its service capacity and safety, consistent with its retention as a scenic two-lane road, and (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. As Exhibits 1 and 2 demonstrate, Caltrans' proposed new Garrapata Bridge barriers neither retain the existing balustrade portals that are an essential element of the State's first scenic highway, nor maintain the highest possible standard of visual beauty and interest, but instead substantially diminish the Garrapata Creek Bridge public critical viewshed and would replace the architecturally interesting and bridge context-congruent open balustrades with incongruent Caltrans stock development peek-a-boo apertures. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

Policy 4.1.2.B.4 provides, in relevant parts, that Caltrans develop an overall design theme for the construction and appearance of improvements within the Highway 1 right-of-way in cooperation with the State Department of Parks and Recreation, the U. S. Forest Service and local citizens. Design criteria shall apply (e.g.) to roadway railings and bridges. The objective of such criteria shall be to ensure that all improvements are inconspicuous and are in harmony with the rustic natural setting of the Big Sur Coast. The special report by local citizens entitled, Design Standards for the Big Sur Highway, on file at the County Planning Department, should serve as a guide and point of departure for Caltrans and other public agencies in developing a design theme for Highway 1 and in making improvements within the State right-of-way. The Caltrans-proposed new Garrapata Bridge barriers do not reflect a comprehensive, inconspicuous, and harmonious design, appearance, and construction theme that has been prepared either in consultation with all interested local citizens and on the basis of the local citizen's' special report, Design Standards for the Big Sur Highway. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

(d) LCP Policy 5.4.2 requires, in relevant parts, that (1) all development and use of the land whether public or private shall conform to all applicable policies of this plan and shall meet the same resource protection standards, and (2) like other uses, public uses must meet the strict resource protection and environmental criteria of the LCP. As shown on Exhibits 1 and 2, and discussed herein, the Caltrans-proposed new Garrapata Creek Bridge barriers are inconsistent with numerous LCP land use plan policies. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

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(e) LCP Policy 6.1.3 provides, in relevant parts, that (1) the protection of visual access should be emphasized throughout Big Sur as an appropriate response to the needs of recreationists, and (2) visual access shall be maintained by directing all future development out of the viewshed. Garrapata Creek Bridge, in concert with the other five subject Big Sur bridges, constitutes a substantial public recreational element of regional, national, and international significance. However, the Caltrans-proposed new Garrapata Bridge barriers are squarely located in the critical viewshed and would substantially diminish the quantity and quality of that visual access, rather than protect it, inconsistent with this Policy. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

(f) LCP Policy 6.1.4.4. provides, in relevant part, that visual access should be protected for long term public use. However, the Caltrans-proposed new Garrapata Creek Bridge barriers would substantially diminish the long-term quantity and quality of that visual access, rather than protect it, inconsistent with this Policy. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

(g) LCP Policy 6.1.6 provides, in relevant part, that structural improvements to accessways should be kept to a minimum to reduce impacts to viewshed. Garrapata Creek Bridge constitutes an important segment of the lateral California Coastal Trail public access network through the Big Sur critical viewshed. As Exhibits 1 and 2 demonstrate, the Caltrans-proposed new structural barriers on the Bridge constitute substantial, rather than minimized, structural intensification that significantly impedes and diminishes impacts to the viewshed, instead of reducing them. The LCP therefore requires the Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

(h) LCP Policy 7.1.1. provides, in relevant parts, that for Coastal development permit applications to be approved, permit applicants will be required to demonstrate conformance to the plan, including, but not limited to, (1) the proposed project must fully meet the objectives, policies, and standards for each applicable section of the Plan. If the proposal is not consistent with these policies, it shall not be approved even though it may be consistent with land use designations for the area, (2) all proposals must fully comply with the California Environmental Quality Act and meet the environmental standards of the LCP. and (3) applicants are responsible for providing all necessary information to support proposals as described in the policies concerning development and resources. As shown on Exhibits 1 and 2, and discussed herein, the Caltrans-proposed new Garrapata Bridge barriers are inconsistent with numerous LCP land use plan visual quality (environmental) protection policies; Caltrans has not provided the Planning Commission with an analysis of all of the six similar Big Sur bridge barrier projects, which precludes the Commission from being able to fully analyze the potentially significant cumulative and indirect effects of the Garrapata Creek bridge barrier project; Caltrans has not proposed, or incorporated mitigations that would result in, the least environmentally damaging project alternative (here, Bridge balustrade repair and maintenance, potentially with interior steel enhancements), as required by CEQA; Caltrans has invalidly excluded the federally funded Garrapata Creek Bridge barrier project from review pursuant to the National Environmental Policy Act; and from the absence of accurate and complete project visual quality impact analyses, as well as of site- and project-specific drawings in plan view, section view, and elevation view, it appears that Caltrans has not provided the Planning Commission with all necessary information to support the development proposal. The LCP therefore requires the


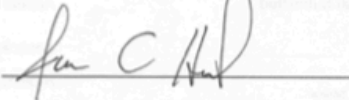



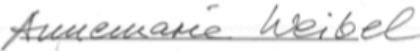

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Planning Commission to deny the Caltrans CDP application. (LCP Zoning Code § 20.70.050.B.3.)

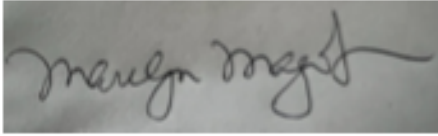
5. Conclusion and Request. Caltrans' Garrapata Creek Bridge barrier project is unsupported by the requisite description of the whole project, analysis of feasible project alternatives that would likely reduce the significant visual quality effects of the proposed project, and incorporated mitigation measures that would likely reduce the significant visual quality effects of the proposed project. As a result, the project is inconsistent with numerous specific mandatory LCP visual quality protection standards.

The Albion Bridge Stewards therefore commend the Planning Commission for its determination on February 22, 2023 that the CDP application for the project be denied, and respectfully request the Commission, on specific relevant findings, to formally deny it on March 8, 2023.

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

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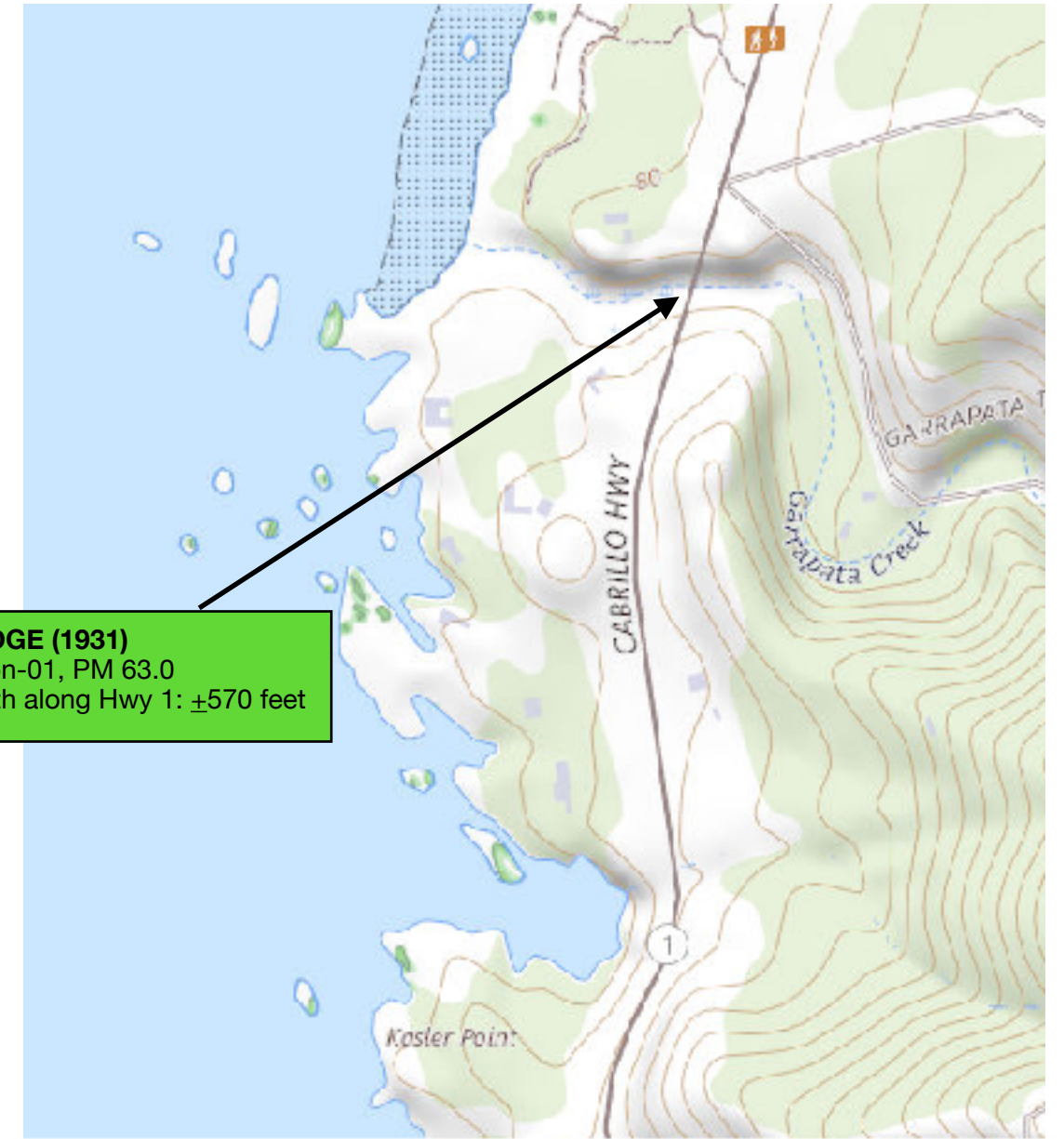
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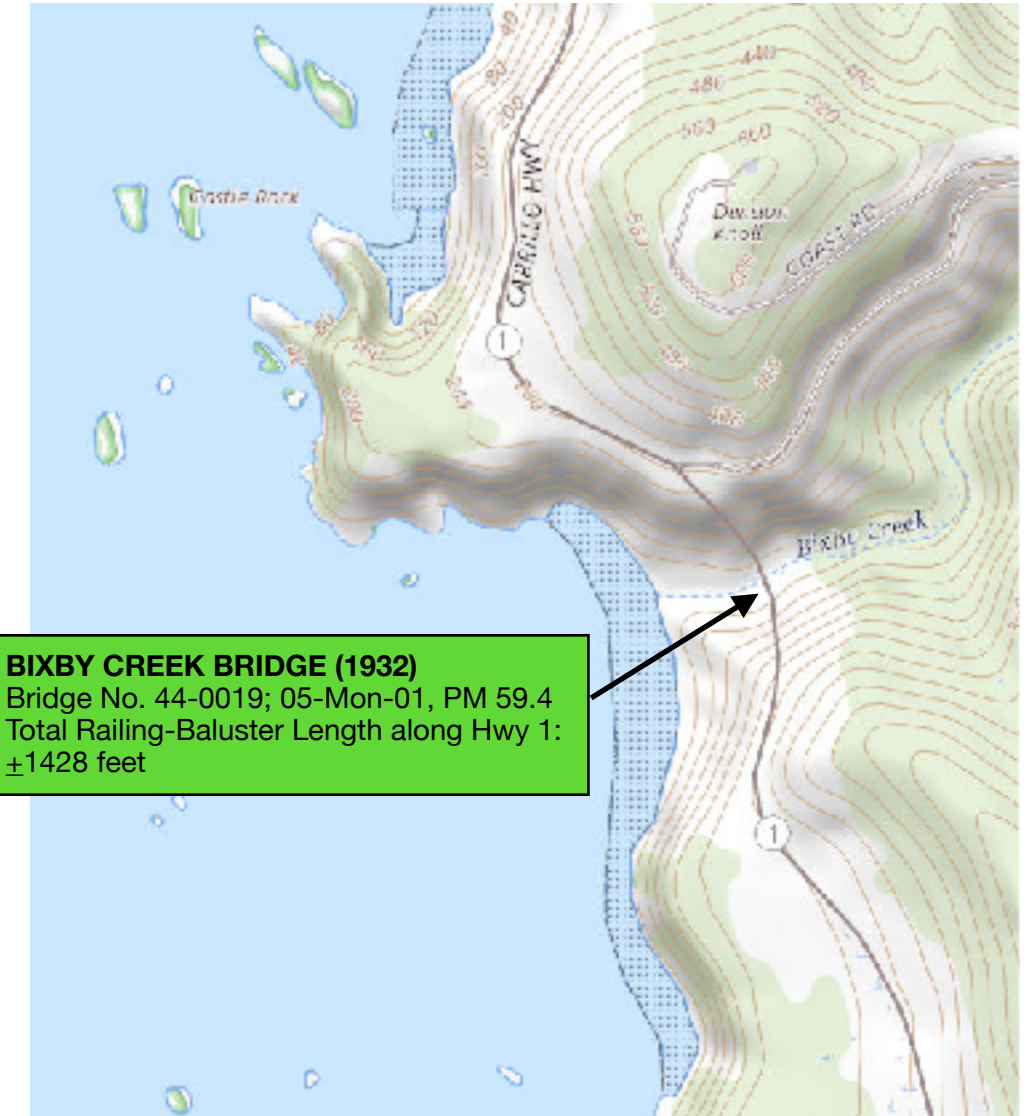
Garrapata Creek Bridge. Photo date: October 2, 2019, CCRP Image 201900706 .



GARRAPATA CREEK BRIDGE (1931)
 Bridge No. 44-0018; 05-Mon-01, PM 63.0
 Total Railing-Baluster Length along Hwy 1: ±570 feet



Garrapata Creek Bridge Railings and Balusters. Photo date: October 2, 2019; excerpt from CCRP Image 201900706



Bixby Creek Bridge. Photo date: October 2, 2019, CCRP Image 201900745.



Bixby Creek Bridge Railings and Balusters. Photo date: October 2, 2019; excerpt from CCRP Image 201900745.

EXHIBIT 1. Albion Bridge Stewards, Six Carmel-San Simeon State Highway Historic District-Big Sur-Hwy 1 Bridges Railings-Balusters Analysis, prepared in honor of California State Senator and California Coastal Commissioner Fred S. Farr (D-Carmel). Credits: California Coastal Records Project (CCRP) photos: Copyright © 2002-2019 Kenneth & Gabrielle Adelman - Adelman@Adelman.COM. Topographical map excerpts from US Geological Survey, The National Map, March, 2023.



Rocky Creek Bridge. Photo date: October 2, 2019, excerpt from CCRP Image 201900737.

ROCKY CREEK BRIDGE (1932)
Bridge No. 44-0036; 05-Mon-01, PM 60.0
Total Railing-Baluster Length along Hwy 1: ±994 feet



Rocky Creek Bridge Railings and Balusters. Photo date: October 2, 2019; excerpt from CCRP Image 201900737.

EXHIBIT 1. Albion Bridge Stewards, Six Carmel-San Simeon State Highway Historic District-Big Sur-Hwy 1 Bridges Railings-Balusters Analysis, prepared in honor of California State Senator and California Coastal Commissioner Fred S. Farr (D-Carmel). Credits: California Coastal Records Project (CCRP) photos: Copyright © 2002-2019 Kenneth & Gabrielle Adelman - Adelman@Adelman.COM. Topographical map excerpts from US Geological Survey, The National Map, March, 2023.



Granite Canyon Bridge. Photo date: October 2, 2019, excerpt from CCRP Image 201900694.



GRANITE CANYON BRIDGE (1932)
 Bridge No. 44-0012; 05-Mon-01, PM 64.03
 Total Railing-Baluster Length along Hwy 1: ±576 feet



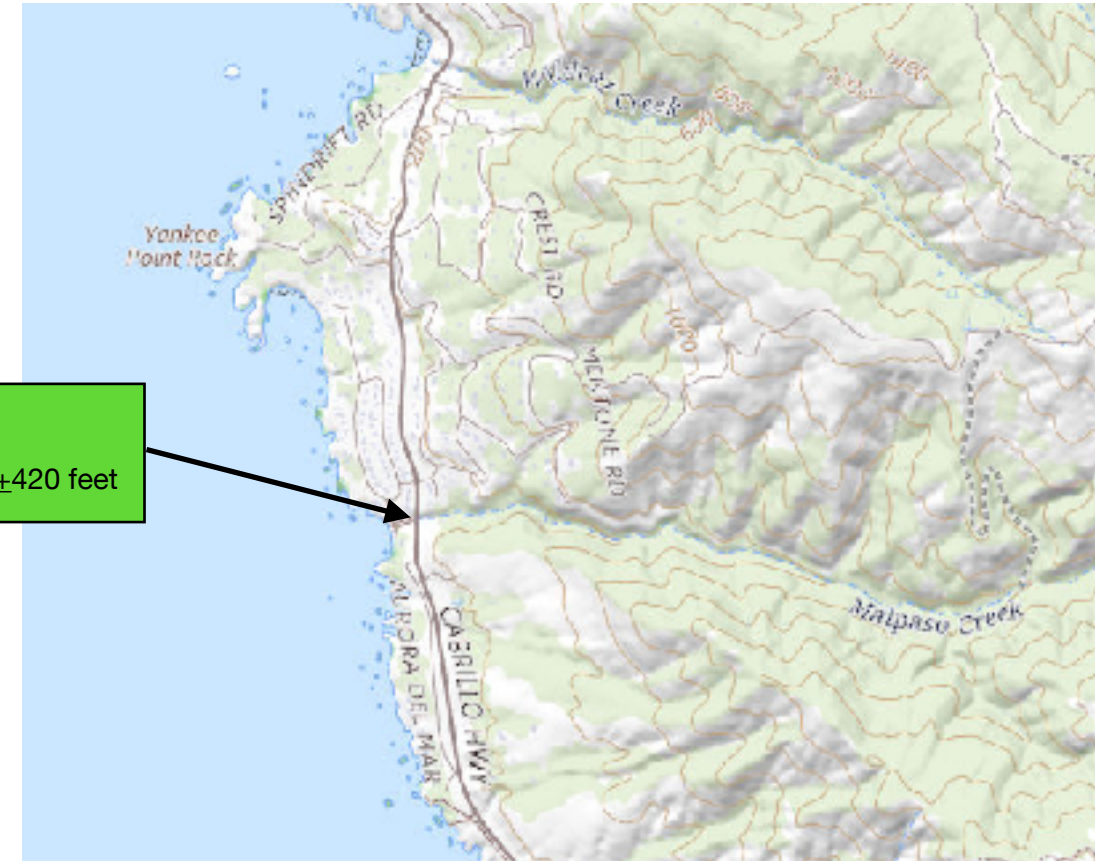
Granite Canyon Bridge Railings and Balusters. Photo date: October 2, 2019; excerpt from CCRP Image 201900694

EXHIBIT 1. Albion Bridge Stewards, Six Carmel-San Simeon State Highway Historic District-Big Sur-Hwy 1 Bridges Railings-Balusters Analysis, prepared in honor of California State Senator and California Coastal Commissioner Fred S. Farr (D-Carmel). Credits: California Coastal Records Project (CCRP) photos: Copyright © 2002-2019 Kenneth & Gabrielle Adelman - Adelman@Adelman.COM. Topographical map excerpts from US Geological Survey, The National Map, March, 2023.



Malpaso Creek Bridge. Photo date: October 2, 2019, excerpt from CCRP Image 201900658.

MALPASO CREEK BRIDGE (1935)
 Bridge No. 44-0017; 05-Mon-01, PM 67.9
 Total Railing-Baluster Length along Hwy 1: ±420 feet



Malpaso Creek Bridge Railings and Balusters. Photo date: October 2, 2019; excerpt from CCRP Image 201900658



EXHIBIT 1. Albion Bridge Stewards, Six Carmel-San Simeon State Highway Historic District-Big Sur-Hwy 1 Bridges Railings-Balusters Analysis, prepared in honor of California State Senator and California Coastal Commissioner Fred S. Farr (D-Carmel). Credits: California Coastal Records Project (CCRP) photos: Copyright © 2002-2019 Kenneth & Gabrielle Adelman - Adelman@Adelman.COM. Topographical map excerpts from US Geological Survey, The National Map, March, 2023.



BIG CREEK BRIDGE (1938)
 Bridge No. 44-0056; 05-Mon-01, PM 28.1
 Total Railing-Baluster Length along Hwy 1: ±1178 feet

Big Creek Bridge. Photo date: September 11, 2015, excerpt from CCRP Image 201501549.



Big Creek Bridge Railings and Balusters. Photo date: September 11, 2015; excerpt from CCRP Image 201501549.