

From: [REDACTED]
To: [Angelo, Philip](#)
Subject: Re: [Calclg-1] Design Exceptions for Historic Bridge Rehabilitation / Repair
Date: Sunday, March 3, 2024 7:35:35 PM
Attachments: [image001.png](#)
[05-1H800 Garrapata creek bridge Memo.pdf](#)
[Garrapata Bridge Rail Replacement Memo- Foley Signed \(002\).pdf](#)

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Okay, I see no federal environmental documentation. What level federal document is being proposed? This would have been determined during Caltrans' planning phases and in documents like PID/PEARs. The 4(f) is still going to force this issue. The recommendation should have been to replace the rails "in-kind." This is not just going to cause an adverse effect to the single bridge, but will ultimately result in a cumulative adverse effect to the entire historic district, certainly if the Tier 1 project goes forward as planned. That could result in the historical district being delisted from the National and California registers.

I am a former Caltrans senior environmental planner, with 30 years (1980-2010) at the agency, all in District 11. I was involved in every historic bridge in San Diego County both on and off the state highway system. Down here we have a similar historical corridor on State Route 163 through our Balboa Park. All the bridge overcrossings, the roadway, landscape, etc. are eligible for the National and California Registers. For years efforts were made to replace the rails on the bridges because "they do not meet current design standards." District 11 has always told Sacramento Structures to it in my words, "stuff it!" Ultimately, it is each individual Caltrans District's decision. The curbs on each bridge crossing over SR-163 are a foot high, so there was zero accident data to justify the rail changes. No car was going to jump one of those rails and launch itself off the bridge. These entire efforts are being done to avoid future liability situations, and in District 11's case they decided the liability potential was so infinitesimal, with the environmental consequences being so weighty to dissuade anyone from wanting to replace the rails. Additional, a very vocal, local historical preservation community was waiting and willing to enter the fray had replacement options been further pursued.

I don't know if any of this helps.

On Feb 29, 2024, at 8:17 PM, Martin Rosen [REDACTED] wrote:

The 4(f) evaluation is going to force a consideration of alternatives to an adverse effect finding. There is no getting around that. Extraordinary claims would have to be made to allow the rail replacement, the fact they don't meet current design standards is not an adequate rationale. The engineers are creating the issue by making false claims about having to meet current design standards. I won't be able to take a deeper dive into this until weekend.

Cheers!

On Feb 29, 2024, at 7:06 PM, Angelo, Philip <AngeloP@co.monterey.ca.us> wrote:

Hi Martin,

Thank you, as the lead agency Caltrans prepared an EIR, so as responsible agency if the County were approving the project we would need to consider it and adopt our own CEQA findings. In this case our Board of Supervisors has given us direction to prepare a resolution of intent to deny the project; in the denial resolution we're recommending that the Board find denial of the project statutorily exempt from CEQA.

“If the only reason they want to replace the rails is because they do not meet current design standards then it is BS they must be replaced.” This has been one of the major contentions on the project since the beginning. The EIR defined one of the objectives of the project to be replacement of a non-standard rail with a standard rail and removed other alternatives from consideration, in part because they aren't a standard rail. They are contending that there are no design exceptions for bridge rail replacements. Other materials they've provided and our research contradict this.

I don't know how much time you have, this is our project website (Garrapata Creek Bridge Rail

Replacement): <https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/current-planning/general-info/current-major-projects>

Any examples where design exceptions were considered/approved for historic bridges would be extremely helpful.

Best,



Phil Angelo (*he/him or they/them*)
Associate Planner
Housing and Community Development
1441 Schilling Place South 2nd Floor, Salinas, CA 93901
Direct: (831) 784-5731

| AngeloP@co.monterey.ca.us

From: Martin Rosen [REDACTED]
Sent: Thursday, February 29, 2024 5:39 PM
To: Angelo, Philip <AngeloP@co.monterey.ca.us>
Subject: Re: [Calclg-l] Design Exceptions for Historic Bridge Rehabilitation / Repair

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Hi Phil,

I would ask Caltrans what the federal nexus is that requires Section 106 and 4(f). Your responsibilities under CEQA will require the preparation of an EIR since the bridge rail replacement will cause an adverse effect; I assume the bridge has been found to be eligible for the National and California Registers in accordance with the Caltrans historic bridge inventory. Under CEQA one significant impact to a resource requires the preparation of an EIR. If the proposed new rails are not context sensitive or an homage to the original rail design you are heading down a bad path environmentally.

The feds have produced a manual called “Flexibility in Highway Design” that makes exceptions for historical resources. It is available for download online. **If the only reason they want to replace the rails is because they do not meet current design standards then it is BS they must be replaced.**

Marty

On Feb 29, 2024, at 5:10 PM, Angelo, Philip
<AngeloP@co.monterey.ca.us> wrote:

Hi Martin,

Awesome! Thank you for reaching out. Unfortunately we’ve

received contradictory information on this. The project (replacement of the bridge rails on the Garrapata Creek Bridge) is on Highway 1 (a state highway) and no federal funding is involved.

However, Caltrans undertook Section 106 consultation under the National Historic Preservation Act (NHPA) and a section 4(f) analysis under the Department of Transportation Act under their assignment of responsibility from the FHWA.

Best,

<image001.png>

Phil Angelo (*he/him or they/them*)
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From: Calclg-l <calclg-l-bounces@lists.ohp.parks.ca.gov> **On Behalf Of** Martin Rosen via Calclg-l
Sent: Monday, February 26, 2024 5:54 PM
To: JAMES WHITE via Calclg-l <calclg-l@lists.ohp.parks.ca.gov>
Cc: Martin Rosen [REDACTED]
Subject: Re: [Calclg-l] Design Exceptions for Historic Bridge Rehabilitation / Repair

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Oh boy do I ever! First question, is this a federal undertaking, i.e., are there federal monies, lands or permits involved or required?

On Feb 26, 2024, at 11:16 AM, Angelo, Philip via Calclg-l <calclg-l@lists.ohp.parks.ca.gov> wrote:

Hi,

Does anyone have experience with historic bridge repair/rehabilitation projects in the State of California?

I'm reviewing a permit application where the bridge rails are one of the character defining features of the bridge, and an applicant is proposing to remove and replace them

with a different design. They are saying that any deviation from their current design standards (“AASHTO LRFD BDS-8”, and the Manual for Assessing Safety Hardware “MASH”) is impossible.

Our department has found examples from other states where their bridge rehabilitation programs allow for exceptions to current engineering standards, 2020 AASHTO guidance that specifically talks about design exceptions for bridge rails, and a few examples where crash test ratings were reduced or modified, but successful project case studies are difficult to find.

Best,

<image001.png>

Phil Angelo (*he/him or they/them*)

Associate Planner

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<NCHRP25-25(66)_FR.pdf><2007 Guidelines for
Historic Bridge Rehabilitation.pdf>--

Calclg-l mailing list

Calclg-l@lists.ohp.parks.ca.gov

<https://lists.ohp.parks.ca.gov/mailman/listinfo/calclg-l>

From: [James Hill III](#)
To: [Angelo, Philip](#)
Subject: RE: PLN220090-CALTRANS - Garrapata Creek Bridge Rail Replacement Project Website
Date: Friday, March 15, 2024 8:25:41 AM
Attachments: [image001.png](#)

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Mr. Angelo,

James Hill here from El Sur Ranch.

If the majority of complaints want to keep the original design AND option #1 is a specification that meets Cal Trans specs, then do not let objections waste the boards time and pick option #1 and get the important matters of the county decided and not waste anymore time on the difference between original and Option 1. The difference is grossly insignificant.

Thank you for the opportunity to comment.

Please confirm receipt.

JAMES HILL III

EL SUR RANCH

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From: [Christina McGinnis](#)
To: [Angelo, Philip](#)
Subject: Re: PLN220090-CALTRANS - Garrapata Creek Bridge Rail Replacement Project Website
Date: Friday, March 15, 2024 11:52:26 AM
Attachments: [image001.png](#)

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Hi Phil,

Thank you so much for your thoughtful and thorough response. I must say I am very relieved as it has felt like this project has been a moving target for so long now. Have a nice weekend and thank you again.

Christina

On Friday, March 15, 2024, Angelo, Philip <AngeloP@co.monterey.ca.us> wrote:

Hi Christina,

You're welcome, I'll add a summary.

The project has not changed. We had a denial resolution prepared for January, but the continuance was initiated by the County with support from the applicant; we wanted to give them a final opportunity to address all of the project issues that have been detailed in all of the previous hearings. The time was necessary to incorporate/address any new information in our report and draft resolution. Staff don't believe any of the new materials would alter the conclusions of the previous Board hearing, and some of the materials contain additional contradictory information.

We have a staff report and a denial resolution prepared that the Board would need to consider, and the item needed to come back for the board to take final action on.

Best,



Phil Angelo (*he/him*)

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AngeloP@co.monterey.ca.us

From: Christina McGinnis <mcginnisenv@gmail.com>

Sent: Friday, March 15, 2024 10:50 AM

To: Angelo, Philip <AngeloP@co.monterey.ca.us>

Subject: Re: PLN220090-CALTRANS - Garrapata Creek Bridge Rail Replacement Project Website

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Hi Phil,

Thanks for putting this together. I note a big omission-that the BOS hearing, when they denied it last December, isn't summarized like it was for the Planning Commission's denial. That should be made clear up front. Why did staff continue to negotiate with CALTRANS after the BOS denied it? Why didn't staff bring back findings of denial as directed by the BOS? Has the project changed? All I see in the supplemental package is more justification for the project that was denied.

I am anxious to hear about why this is coming back, yet again.

Best,

Christina McGinnis

On Thu, Mar 14, 2024 at 3:44 PM Angelo, Philip <AngeloP@co.monterey.ca.us> wrote: