

CALIFORNIA COASTAL COMMISSION

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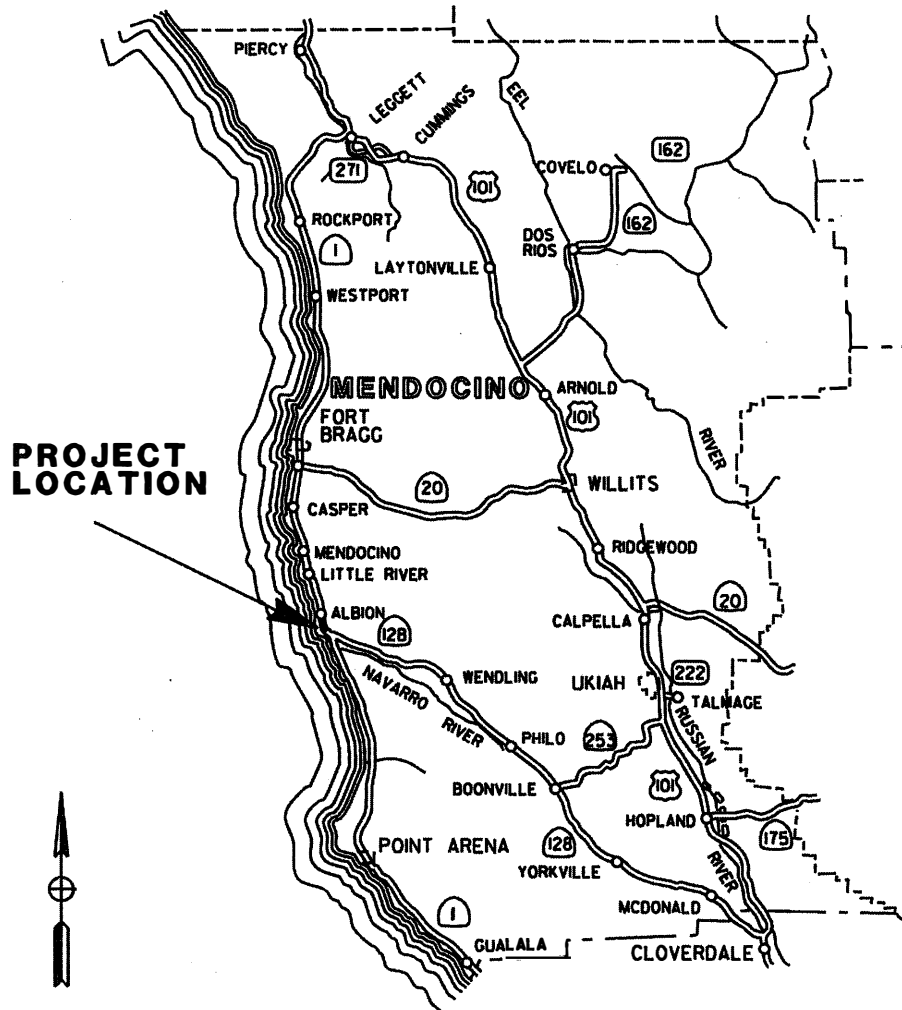
A-1-MEN-22-0014 (Caltrans District 1, Mendocino County)

February 10, 2023

EXHIBITS

- Exhibit 1** – Project Vicinity Map
- Exhibit 2** – Project Location Map
- Exhibit 3** – Project Description
- Exhibit 4** – Project Plans
- Exhibit 5** – Photos of Project Site
- Exhibit 6** – Excerpts from Visual Impact Assessment
- Exhibit 7** – ESHA Maps
- Exhibit 8** – Mendocino County Final Action Notice
- Exhibit 9** – Mendocino County Staff Report
- Exhibit 10** – Appeal Filed

VICINITY MAP



No Scale



CASE: CDP 2019-0024
OWNER: CALTRANS
APN: N/A (Right-of-Way)
APLCT: CALTRANS, Dist. 1
AGENT: Frank Demling
ADDRESS: N/A, Albion

Major Towns & Places Major Roads
 Major Rivers
 Highways

0 2,625 5,250 Feet
 0 0.5 1 Miles

Exhibit 2 – Project Location Map
Appeal No. A-1-MEN-22-0014 (Caltrans)
Navarro Ridge Safety Project
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Navarro Ridge Safety Project Description and Summary

October 2021

Project Location and Existing Conditions

The California Department of Transportation (Department) is proposing to improve the safety of State Route (SR) 1 from Post Miles (PM) 41.8 to 42.3, approximately 1.5 miles north of the junction of SR 128 and SR 1 to 0.1 mile south of Navarro Ridge Road, in Mendocino County, near Albion. Within the project limits, the facility is a two-lane conventional highway on rolling terrain with 12-foot lanes and 0- to 1-foot shoulders. Existing horizontal curves do not meet standard radii at several locations throughout the project limits. The posted speed limit is 55 miles per hour, and a center-line rumble strip is present throughout this segment (i.e., SR 1 from PM 41.8 to PM 42.3). The adjacent land uses are low-density residential and open space rangeland. The project location overlooks the Pacific Ocean, which lies approximately 1,000 feet to the west. A coastal access trail and a parking area for the Navarro Point Preserve are present within the project limits, adjacent to the construction area. The driveway to the coastal access parking area is across the highway from a gated private driveway. There are eight drainage facilities within the project limits:

- 1 six foot box culvert
- 2 12' plastic pipes
- 5 18' culverts
- 1 18" downdrain
- 1 24" pipe

Project Need

Caltrans District 1 Traffic Safety Office initiated the subject project in response to a high incidence of run-off-road collisions. This segment of highway has an actual Fatal collision rate of 18.6 times the Statewide Average (SWA) for similar facilities, an actual Fatal + Injury (F+I) collision rate of 2.0 times the SWA for similar facilities, and actual total collision rate of 1.5 times the SWA for similar facilities. During the most recent 3-year period for which the information is available (January 1, 2016 to December 31, 2018), 3 collisions were reported for the highway segment from PM 41.8 to PM 42.3. A subsequent review of the collision history indicated that shoulder widening would address the run-off-road collisions by providing recovery area when a vehicle is leaving the traveled way. There is a need to reduce the frequency of run-off-road collisions within this highway segment.

Proposed Work

The project proposes to widen the existing lanes to 12 feet, widen the existing shoulders in both directions to 4 feet, improve the superelevation of the road (rate, transition, and runoff), re-establish the drainage facilities and 6-foot box culvert for wildlife passage, install a Midwest Guardrail System (MGS), replace the centerline rumble strip, and remove trees.

Road Surface, Shoulder Widening, and Structural Section

The existing cut bank on the east side of SR 1 will be laid back to provide adequate space for the proposed widening. Final cut slopes, primarily on the east or inland side of SR 1, will not be steeper than 1.1:1. Final fill slopes, primarily on the west or ocean side of SR 1, will not be steeper than 1.4:1. Cut slope heights will be a maximum of 52 feet and fill slope heights will be a maximum of 16 feet. Below many of the existing cut slopes, an inboard ditch carries storm water between culvert inlets. An additional 2 feet of widening beyond the shoulder is included to provide space for this water. Of the approximately 14,075 cubic yards of material removed from the cut banks, up to 3,858 cubic yards would be used to provide fill for the structural section and shoulder extension on the west side of the road. Approximately 10,217 cubic yards of excess material would be hauled off site to an approved disposal site under the responsibility of the contractor.

The construction of the new shoulders will involve the excavation of existing material and the placement of a new structural section. The structural section will consist of 1.30 feet of class 2 aggregate base (Cl 2 AB), and 0.40 foot of type A hot mix asphalt (HMA-A). The new section will be surfaced with an additional 0.15 foot to 1.43 feet of HMA-A (Caltrans 2020a, Sheet X-1). This structural section will help seal longitudinal pavement joints and provide a good surface for receiving new striping. A layer of geosynthetic pavement interlayer (GPI) will be used at the pavement joint where the new section meets the existing material.

Approximately 75 trees will be removed to accommodate the road widening. Approximately 62 trees would be removed on the State Right of Way and 13 trees would be removed from within a Temporary Construction Easement. Of the 75 trees in total, approximately 45 of the trees are alive (12 Bishop pines, 32 Monterey Pines and 1 Douglas fir), approximately 15 are dead standing trees (most likely Monterey pines), and approximately 15 are stumps. These trees may be removed for construction access and widening activities. While the Bishop Pine Forest is considered a vulnerable community (G3/S3), the small number of Bishop pines that are mixed in with Monterey pines are likely planted by land owners for privacy and are likely invading disturbed coastal prairie habitat. Therefore, closed-cone pine-cypress plant community is not considered an ESHA for this project. Additional information is available in the 2019 ESHA report (Caltrans 2019a).

Areas for Contractor Use (Staging Areas) have been identified on the north end of the project in existing pullouts on the west and east side of SR 1 (Caltrans 2019a). Temporary BMPs include silt fence, fiber rolls, temporary high-visibility fence (THVF), street sweeping, stabilized

construction entrance and exits, temporary gravel bag berms, and concrete washouts. A complete Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by the Contractor and shall be submitted to the Caltrans Resident Engineer (RE) for approval.

Drainage Facilities

The existing drainage systems collect and direct runoff from the east side of SR 1 and drain west of SR 1. The proposed widening would require the existing drainage inlets to be removed, and the existing 18-inch culverts to be replaced with 24-inch culverts and extended. The widening will also accommodate additional area beyond the shoulder to perpetuate the existing inboard ditch along the alignment. Following a constructability review with District 1 it was identified that minimum pipe diameter is required to be 24 inches for cross culverts, therefore extending the existing 18-inch cross culverts would not meet standards and requires the replacement of each culvert. The culverts would all be replaced with 24-inch alternative pipe culvert (APC) and have alternative flared end sections (AFES) at the outlets. There will not be any significant changes to historical drainage patterns and the runoff will not encroach onto the travelled way or cause other objectionable backwater during the 10-year and 100-year design storm events (Caltrans 2020b).

There are 8 drainage systems in the project area that will be replaced and improved as part of the proposed project. The drainage systems are numbered from the south end of the project (PM 41.8) to the north end (PM 42.3). Drainage systems 2, 3, 5, and 8 are considered Waters of the United States (jurisdictional); impacts to these features will be permitted under Section 401 and 404 of the Clean Water Act and under Section 1602 of the California Fish and Game Code. Drainage systems 1, 4, 6, and 7 are non-jurisdictional. All 8 of these drainage systems are summarized below and in Table 1. Additional details are available in the Drainage Report (Caltrans 2020b).

Drainage System -1 (DS-1), PM 41.79

DS-1 consists of an existing 8' x 6' x 35.6' box culvert located at the south end of the project area and was originally constructed as a cattle pass to allow egress for pastures on either side of State Route 1. No active flow was observed during any of the field visits. The greater topography as well as lack of characteristics such as channelization and ordinary high water suggest this culvert is not jurisdictional. The box culvert will be improved to allow for the continued use by wildlife. DS-1 would be extended 5.5 feet to the east and 10.5 feet to the west, and new wing walls on the west side of State Route 1 would be installed to accommodate the proposed shoulder widening (Caltrans 2020a, Sheet D-1 & DP-1; Caltrans 2020b).

Drainage System -2 (DS-2), PM 41.83

DS-2 consists of two existing drainage inlets connected in series by two 12-inch plastic pipe culverts that drain runoff from the private driveway on the east side of SR 1. Proposed changes to DS-2 consist of leaving the existing culverts in place and replacing the existing drainage inlets with a Type GO drainage inlet. The culvert outlet is not

proposed to change position and will continue to discharge in the direction of Drainage System – 3, on the east side of Highway 1. DS-2 is considered jurisdictional. The culvert is proposed to have the same outlet location (Caltrans 2020a, Sheet D-1 & DP-1; Caltrans 2020b).

Drainage System -3 (DS-3), PM 41.84

DS-3 consists of an existing slotted drain oriented across a driveway at PM 41.83 nearly parallel with SR-1, that directs flow to an 18-inch culvert. The existing slotted drain has been reported to have a history of clogging and requiring frequent maintenance. DS-3 is considered jurisdictional. The existing slotted drains and culvert are proposed to be removed and replaced with two Type GCP drainage inlets north and south of the driveway and connected in series with two lengths of 24-inch APC. The first culvert would cross under the driveway from north to south, connecting the inlet on the north side of the driveway to the inlet and second length of APC on the south side of the driveway. The second length of 24-inch culvert would be 79.1 feet long to cross under SR 1 and discharge west of the highway. (Caltrans 2020a, Sheet D-1 & DP-2; Caltrans 2020b).

Drainage System -4 and -5 (DS-4 and -5), PM 41.95 & 41.98

DS-4 and -5 each consist of a existing 18-inch reinforced concrete pipe cross culverts that directs drainage from a drainage ditch on the east side of State Route 1 to the west side of the highway. The existing culverts would be removed and replaced with Type G1 drainage inlets oriented within a roadside ditch connected to a 24-inch alternative pipe culvert. The culverts are proposed to drain in the same westerly direction. DS-4 is not considered jurisdictional and appears to convey stormwater only. The replacement 24-inch culvert would be 52.4 feet long. DS-5 is considered jurisdictional. The replacement culvert would be 50.9 feet long (Caltrans 2020a, Sheet D-1 , DP-2, & DP-3; Caltrans 2020b).

Drainage System -6 (DS-6)

DS-6 consists of a drainage inlet within the roadside ditch, connected to a 24-inch corrugated metal pipe cross culvert that directs drainage from the east side of State Route 1 to west of the highway. The existing drainage ditch, inlet and 24-inch pipe are proposed to be replaced with a Type G1 drainage inlet within a new ditch, and a 24-inch alternative pipe cross culvert. The culvert is proposed to drain in the same westerly direction and will receive RSP with RSP fabric. DS-6 is not considered jurisdictional. The replacement culvert would be 43.7 feet long (Caltrans 2020a, Sheet D-1 & DP-3; Caltrans 2020b).

Drainage System -7 (DS-7)

DS-7 consists of a headwall within the roadside ditch, supporting an 18-inch plastic pipe cross culvert, that is connected to a corrugated metal pipe down drain that directs

drainage from the east side of State Route 1 to the west side. Significant erosion has been occurring below the culvert outlet on the west side. To prevent further erosion, which could compromise the fill slope supporting the highway, the existing failing downdrain and culvert will be removed and replaced. DS-7 is not considered jurisdictional.

The existing drainage ditch, inlet and 24-inch pipe would be replaced with a Type G1 drainage inlet within the new ditch on the east side of SR 1, and a 24-inch by 66.4 feet long alternative pipe cross culvert and 24-inch downdrain. The new downdrain would be 15 feet long and would drain in the same direction but will no longer allow discharge to free fall to the current scour grade. Instead, the downdrain will be oriented to discharge to the proposed ¼ ton RSP lined ditch with RSP fabric to help reduce the risk of further erosion (Caltrans 2020a, Sheet D-1 & DP-4; Caltrans 2020b).

Drainage System -8 (DS-8)

DS-8 consists of a drainage inlet within the roadside ditch, connected to an 18-inch corrugated metal pipe cross culvert that directs drainage from the east side of Highway 1 to west of the highway. DS-8 is considered jurisdictional. The existing drainage ditch, inlet and 18-inch pipe would be replaced with a Type G1 drainage inlet within the new ditch, and a 24-inch APC, 45.2 feet long. The culvert is proposed to drain in the same westerly direction. (Caltrans 2020a, Sheet D-1 & DP-3; Caltrans 2020b).

Table 1: Drainage Facility Improvement Summary

Drainage System (DS) No.	Post Mile	Existing facility	Proposed Activity	Jurisdictional Y/N	Drainage Details
1	41.79	6' x 8' x 36' Box Culvert	Replace wingwalls on west side, extend culvert 10.5' west & 5.5' east to accommodate widened shoulder, install cable railing.	N	Originally installed for cattle passage, will be maintained to facilitate wildlife access. Receives intermittent flow from upslope/ offsite and minimal highway storm water run-off; flow appears to quickly infiltrate below the culvert outlet (no evident channel).
2	41.83	Two 12" plastic pipes	Remove existing drainage inlets (DI), replace with Type GO inlets. Culverts to remain in place. Place RSP with RSP fabric at outlet.	Y	This system provides drainage for the private driveway on the east side of SR 1. Flow is down the driveway for a short distance, then is diverted away from the driveway into the adjacent hillslope before flowing into the existing highway DI at DS-3 that also collects some highway storm water run-off.
3	41.84	18" culvert with "Y" slot drain across bottom of	Remove existing slot drain and culvert, replace with 2 type GCP DIs north and south of	Y	The slotted drain has a history of clogging and requires frequent maintenance. The system collects flow from DS-2 and highway runoff. Flow is

Drainage System (DS) No.	Post Mile	Existing facility	Proposed Activity	Jurisdictional Y/N	Drainage Details
		east side driveway.	driveway, 24" culvert across driveway, 24" x 79.1' APC across SR 1 to discharge on west side. Place RSP with RSP fabric at outlet.		concentrated in narrow (1-ft-wide) channel for about 20 feet below culvert outlet, then spreads out to form a broad wet meadow.
4	41.95	18" x 36.7' reinforced concrete pipe	Replace with 24" x 52.4' APC, install type G1 DI, install 24" AFES	N	Collects highway stormwater runoff, flow appears to immediately infiltrate below the culvert outlet
5	41.98	18" x 37.5' reinforced concrete pipe.	Replace with 24" x 50.9' APC, install Type G1 DI, install 24" AFES	Y	Drains underground flow from an ephemeral spring located upslope/off-site, into the existing highway DI that also collects minimal highway storm water run-off; flow appears to immediately infiltrate below the culvert outlet
6	42.02	24" x 32.1' corrugated metal pipe	Replace with 24" x 43.7' APC, install Type G1 DI, install 24" AFES	N	Drains underground flow from an ephemeral spring located upslope/off-site, into the existing highway DI that also collects minimal highway storm water run-off; flow appears to immediately infiltrate below the culvert outlet
7	42.11	18" x 34' & 18" x 33.4' downdrain	Replace with 24" x 66.4' APC & 15' down-drain, remove headwall, install Type G1 DI, line gully with 1/4 ton rock slope protection	N	Drains highway storm water run-off and possibly upslope/offsite surface run-off (no evident channel or spring); steep erosional gully formed in the highly erodible soil below the culvert outlet. Downdrain will be oriented to discharge to the proposed ¼ ton RSP lined ditch with RSP fabric to help reduce the risk of further erosion
8	42.26	18" x 38.4' corrugated metal pipe culvert	Replace with 24" x 45.2' APC, replace DI with Type G1 DI, RSP & 24" AFES	Y	Drains underground flow from a nearly perennial spring located upslope/off-site, into the existing highway DI that also collects minimal highway storm water run-off; 2-ft channel formed below culvert outfall modified by property owner.
Source: Plan Set, Caltrans 2020a; Drainage Report, Caltrans July 2020b					

Midwest Guardrail System and Centerline Rumble Strip

The new MGS would be installed from PM 42.11 to PM 42.30 will include both standard sections and 7-foot post segments in narrow roadway locations. A new Omit One Post (MGS)

"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"

will be installed from PM 41.78 to PM 41.80 to span the inlet and outlet of the 6-foot box culvert on both sides of SR 1 (Caltrans 2020a, Sheet L-1). The MGS to be installed within the project limits will be treated with a light-brown stain to reduce glare and to blend the MGS into the visual character of the natural landscape. Minor concrete vegetation control will be placed under the new guard rail. The centerline rumble strip will be replaced to act as an audible warning to vehicles when encroaching into opposing traffic. No edge line rumble strips will be installed.

Traffic Control

The anticipated traffic control measures are reversing traffic control, moving lane closure, and shoulder closure. One-lane closure is permitted within the project limits. A minimum of 12 feet of paved roadway must be open for use by public traffic. Bicyclists will be accommodated through the work zone. Signage will be used to alert vehicle operators to the possible presence of bicyclists. The estimated maximum delay during one-way reversing traffic control will be 10 minutes. Access to side roads and residences will be maintained at all times.

Environmentally Sensitive Habitat Areas

Environmentally Sensitive Habitat Areas (ESHA) are discussed at length in Appendix B to the CDP Application, the Environmentally Sensitive Habitat Area (ESHA) Analysis (Caltrans 2019), and the ESHA Correction Memo (Caltrans 2019b). The report and memo are briefly summarized below in Table 2.

Studies were conducted within the project area and within a 100-foot buffer around the project's environmental study limit (ESL) to satisfy the conditions of the Coastal Element of the Mendocino County General Plan. These included the Areas for Contractor Use (Staging Areas) shown in Figure 7 of Appendix A of the ESHA Analysis (Caltrans 2019). A Reduced Buffer Analysis as required by Section 20.496.020 of the Mendocino County Zoning Code is presented in the ESHA Analysis as well (Caltrans 2019). According to the Mendocino County LCP Chapter 20.496, highway activities can be allowed within ESHA buffers when avoidance is not feasible.

The following areas were identified that meet the definition of ESHA. Several of the ESHAs described in the ESHA Analysis and summarized below, including W-1, OW-1, and OW-2, are not nearby construction activities (Caltrans 2019). They were included in this analysis due to their proximity to the staging area. These ESHAs will not be affected by this project. For more detail and discussion on each of the identified ESHA, please refer to the Environmentally Sensitive Habitat Area (ESHA) Analysis, (Caltrans 2019), and the ESHA Correction Memo, (Caltrans 2019b).

Table 2: Impacts to Environmentally Sensitive Habitat Areas (ESHA)

ESHA	ESHA Description	Permanent Impact Area and Description	Approximate Temporary Impact Size	Details
CW-1	Coastal Wetland	0	0	No impacts anticipated
CW-2	Coastal Wetland	0	0	No impacts anticipated
W-1	3 Parameter Wetland	0	0	No impacts anticipated
W-2	3 Parameter Wetland	0	0	No impacts anticipated.
W-3	Roadway Drainage Ditch*	0	70 LF 0.008 acre	Temporary displacement – removal and replacement may be necessary.
W-4	Roadway Drainage Ditch*	0	0	No impacts anticipated.
D-1	Roadway Drainage Ditch	0	167 LF/ 0.003 acre	Temporary displacement associated with shoulder widening.
D-2	Roadway Drainage Ditch	0	728 LF/ 0.017 acre	Temporary displacement associated with shoulder widening.
D-3	Roadway Drainage Ditch	0	629 LF/ 0.014 acre	Temporary displacement associated with shoulder widening.
D-4	Parking Lot Drainage Ditch	0	0	No impacts anticipated
OW-1	Ephemeral Drainage	0	0	No impacts anticipated
OW-2	Perennial Drainage	0	0	No impacts anticipated

ESHA	ESHA Description	Permanent Impact Area and Description	Approximate Temporary Impact Size	Details
OW-3	Ephemeral Drainage	0	0	No impacts anticipated
OW-4	Ephemeral Drainage at Drainage System 8.	Approx. 13' culvert extension	4 LF, 0.002 acre	Impacts from culvert replacement, extension, and new DI installation. Temporary impacts result of construction impacts at inlet.
OW-5	Ephemeral Drainage at Drainage System 7	Approx. 8' culvert extension, 0.017 acre RSP at down drain and rock lined ditch	4 LF, 0.002 acre	Impacts from culvert and down drain replacement, extension, and new DI installation. Fill erosional feature at outlet with RSP. Temporary impacts result of construction impacts at inlet.
OW-6	Ephemeral Drainage at Drainage System 6	Approx. 9' culvert extension	4 LF, 0.002 acre	Impacts from culvert replacement, extension, and new DI installation. Temporary impacts result of construction impacts at inlet.
OW-7	Ephemeral Drainage at Drainage System 5	Approx. 15' culvert	4 LF, 0.002 acre	Impacts from culvert replacement, extension, and new DI installation. Temporary impacts result of construction impacts at inlet.
OW-8	Ephemeral Drainage at Drainage System 4	Approx. 12' culvert extension	4 LF, 0.002 acre	Impacts from culvert replacement, extension, and new DI installation. Temporary impacts result of construction impacts at inlet.
OW-9	Ephemeral Drainage at Drainage System 1	16' of box culvert extension	4LF, 0.002 acre	This facility is the box culvert for wildlife passage at DS-1. Impacts from box culvert extension.
OW-10	Ephemeral Drainage at Drainage System 2 & 3	No culvert extensions	4 LF, 0.002 acre	Impacts from new DI installation. Temporary impacts result of construction impacts at inlets.

ESHA	ESHA Description	Permanent Impact Area and Description	Approximate Temporary Impact Size	Details
TOTAL		73 linear feet	1622 LF, 0.056 acre	Impacts from culvert extensions, inlet replacement, and RSP placement at outlets.
<p>* Two features (W-3, W-4) were initially identified as 3 parameter wetlands, but upon further review and consultation with Agency personnel, these were determined to be "Other Waters of the U.S.". Original descriptions were provided in the ESHA analysis (Caltrans, 2019) and the corrected determination provided in the ESHA Correction Memo (Caltrans, 2019b). Source: Caltrans 2019: Environmentally Sensitive Habitat Area (ESHA) Report; Caltrans 2019b: ESHA Correction Memo</p>				

Disturbed Surface Area

The Disturbed Soil Area (DSA) for this project is estimated at 4.73 acres. The existing impervious area within the project construction limits is 1.68 acres, which consists of the existing paved roadway. After construction of the widened roadway surfaces, the post-project impervious area is proposed to be 2.16 acres. Net new impervious (NNI) area was calculated by taking the difference between the post-project impervious area and the existing impervious area, which was calculated to be 0.48 acres. Replaced impervious surface (RIS) was calculated using MicroStation and typical-cross sections. These were used to find the difference between where existing roadway and proposed sections overlapped, and where these areas resulted in disturbance of subgrade. RIS was calculated to be 0.29 acres. New impervious surface (NIS) was calculated by taking the sum of the NNI and RIS and subtracting the excluded impervious area. The NIS was calculated to be 0.77 acres, which is less than the 1 acre increase that would require permanent BMP installation.

Impacts as a result of the DSA, including stormwater treatment and low impact development features, will be permitted under Section 401 and 404 of the Clean Water Act. An application has been submitted to the Water Quality Control Board and is currently under development. Biofiltration strips have been proposed for treatment of the runoff on this project. The strips are proposed to be located adjacent to the roadway to allow runoff to flow through and be treated as much as possible before entering a water body. Additional stormwater management and construction Best Management Practices (BMPS) are provided for in the Standard Measures and BMPS discussed below.

Project Features, Standard Measures, and Best Management Practices

Caltrans has incorporated a number of Project Features, Standard Measures, and Best Management Practices into the design and construction of the project to minimize impacts. These measures are prescriptive and sufficiently standardized to be generally applicable, and do not require special tailoring to a project situation. These are generally measures that result from laws, permits, guidelines, and resource management plans that are relevant to the project. They contain refinements in planning policies and implementing actions. These practices predate the project's proposal and apply to all similar projects. These measures are provided in the ESHA Analysis in Section 1.3 (Caltrans 2019), and describe actions to minimize impacts to the following resources:

- Water Quality and Storm Water Runoff
- Wetlands and Other Waters
- Natural Communities
- Animal Species
- Invasive Species

Erosion Control and Revegetation Efforts

Erosion control planting will be implemented across the project area once construction is completed. This would be done by the contractor as part of the construction contract. Details are included in the Plan Set submitted as part of the CDP application (Caltrans 2020a, Sheets ECL-1, EC-1, EC-2, & ECQ-1). Additional revegetation efforts would be completed by Caltrans Stewardship group and be focused at the jurisdictional waterways. These measures are summarized below and described in detail in the Revegetation Plan (Caltrans 2021).

New slopes will be stabilized and vegetated in accordance with plans approved by the District Landscape Architect. Final soil stabilization strategies include the use of 3 different types of erosion control, which consist of a combination of: compost, duff, hydraulic biotic growth medium, and a fiber reinforced matrix. Additional slope stabilization methods to be used include RECP netting, compost socks, duff berms, and fiber rolls. Existing vegetation will be preserved to the maximum extent practicable and in accordance with existing environmental permits and agreements. Erosion control would include hydroseeding with a native species seed mix, including but are not limited to, Common Yarrow, Spanish Clover, California Mugwort, California Brome, and California Oatgrass. For a complete list of species and erosion control activities refer to the Project Plans (Caltrans 2020a, Sheets ECL-1, EC-1, EC-2, & ECQ-1).

Revegetation goals of Caltrans Stewardship are to restore areas surrounding Waters of the United States impacted by construction utilizing a specific, regionally-appropriate native seed mix, and to limit new introduction of invasive plant species rated high by the California Invasive Plant Council (Cal-IPC) in the project area. One invasive species currently growing onsite is Himalayan blackberry (*Rubus armeniacus*), and Caltrans will not attempt to eradicate this Cal-IPC high rated species onsite. The seed mix was developed by Caltrans Landscape Architecture in collaboration with the Revegetation Specialist.

Anticipated impacts include up to 0.01 acre of temporary impacts and 0.0028 acre of permanent impacts to Waters of the United States, across three drainage facilities. Areas around these facilities consist of mainly non-native grasses and small coyote brush (*Baccharis pilularis*) seedlings. These areas are subjected to regular Caltrans maintenance which includes mowing.

The proposed revegetation areas include drainage systems 2 and 3 at PM 41.83 and 41.84, drainage system 5 at PM 41.98, and drainage system 8 at PM 42.26 at both the inlets and outlets where disturbance is proposed to occur. The erosion control seed mix was designed to take the place of planting. No additional container plants are proposed for this project due to minimal impacts and safety concerns. A specific native seed mix will be applied to areas of disturbance. These areas will be monitored for 3 years to assess the establishment of the native seed mix and recruitment of native plants. Monitoring for the presence and abundance of newly introduced invasive species rated high by Cal-IPC will also occur. These areas are summarized in Table 2, below.

Table 2: Estimate of Impacts Requiring Revegetation

Culvert Post Mile	Habitat Type	Permanent Impacts		Temporary Impacts	
		Length (ft)	Area (acres)	Length (ft)	Area (acres)
41.83/41.84	Drainage Ditch	110	0.01	0	0
41.98	Stream	6	0.0001	36	0.0008
42.26	Stream	6	0.0001	100	0.002
Total		122	0.0102	136	0.0028
Source: Navarro Ridge Safety Project Revegetation Plan, 2021					

Hydroseeding will be implemented at the end of the construction period by a qualified contractor. Weeding will be performed by Caltrans staff when necessary during the three-year maintenance and monitoring period. Timing of weeding will take into consideration the blooming period of any newly introduced Cal-IPC rated high invasive species that germinate onsite to prevent these plants from producing seeds and spreading.

References

California Department of Transportation (Caltrans), 2019a: Environmentally Sensitive Habitat Area (ESHA) Assessment for the Navarro Ridge Safety Project, Albion 7.5-minute USGS Quadrangle, State Route 1 Mendocino County PM 41.80 to 42.30 EA 01-0C550; EFIS 0112000300, June 2019

Caltrans 2019b: ESHA Correction Memo, from Caltrans North Region Environmental, to Jessi Davis, Mendocino County Planning and Building Department, September 12, 2019.

Caltrans 2020a: Project Plans for Construction on State Highway in Mendocino County near Albion from 1.5 miles north of State Route 128 to 0.1 mile south of Navarro Ridge Road. June 2020

Caltrans 2020b: Drainage Report for State Route 1 Navarro Ridge Safety Project, Mendocino County. Prepared for Caltrans, District 3 North Region Project Development. Prepared by Caltrans District 3 North Region Project Development, Design M3. July 2020.

Caltrans 2021: Onsite Revegetation Plan for the Navarro Ridge Safety Project. Mendocino County, State Route 1, Post Miles 41.80/ 42.30. EA 01-0C550/ EFIS 0112000300. October 2021.

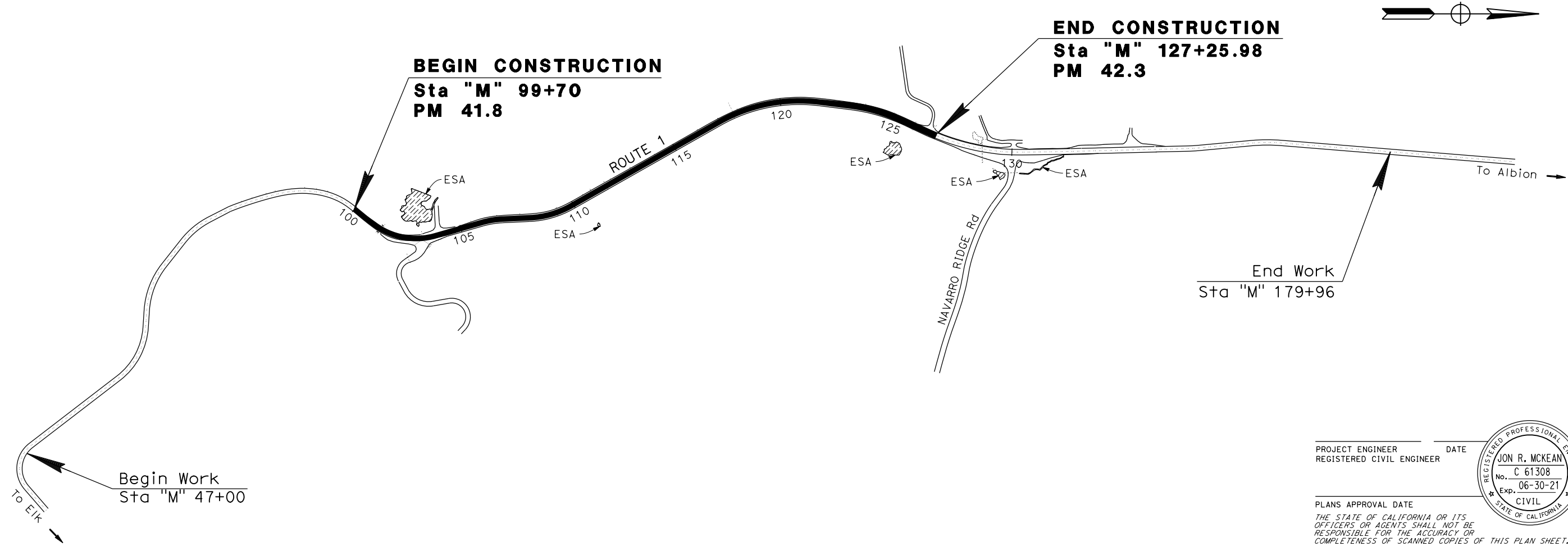
STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION
PROJECT PLANS FOR CONSTRUCTION ON
STATE HIGHWAY
IN MENDOCINO COUNTY NEAR ALBION
FROM 1.5 MILES NORTH OF THE JUNCTION OF ROUTE 128
TO 0.1 MILE SOUTH OF NAVARRO RIDGE ROAD

TO BE SUPPLEMENTED BY STANDARD PLANS DATED 2018

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET NO.	TOTAL SHEETS
01	Men	1	41.8/42.3		



LOCATION MAP



PROJECT MANAGER
FRANK DEMLING

DESIGN MANAGER
JAMES D. RASMUSSEN

THE CONTRACTOR SHALL POSSESS THE CLASS (OR CLASSES)
OF LICENSE AS SPECIFIED IN THE "NOTICE TO BIDDERS."

NO SCALE


RELATIVE BORDER SCALE 0 1 2 3
IS IN INCHES

USERNAME => s148600
DGN FILE => 0112000300ab001.dgn

UNIT 030

PROJECT ENGINEER
REGISTERED CIVIL ENGINEER

DATE



JON R. MCKEAN
No. C 61308
Exp. 06-30-21
CIVIL
STATE OF CALIFORNIA


PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS
OFFICERS OR AGENTS SHALL NOT BE
RESPONSIBLE FOR THE ACCURACY OR
COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.


Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE



PLANS APPROVAL DATE



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NOTES:

1. DIMENSIONS OF THE PAVEMENT STRUCTURES (STRUCTURAL SECTIONS) ARE SUBJECT TO TOLERANCES SPECIFIED IN THE STANDARD SPECIFICATIONS.
2. SUPERELEVATIONS ARE SHOWN ON THE SUPERELEVATION DIAGRAMS.
3. FOR EXACT LOCATIONS OF COLD PLANE LIMITS, RUMBLE STRIPS, AND GUARDRAIL LIMITS, SEE LAYOUT SHEETS.
4. CONSTRUCT THE TOP 0.15' HMA-A LAYER AS OVERLAY FROM EDGE OF PAVEMENT TO EDGE OF PAVEMENT.

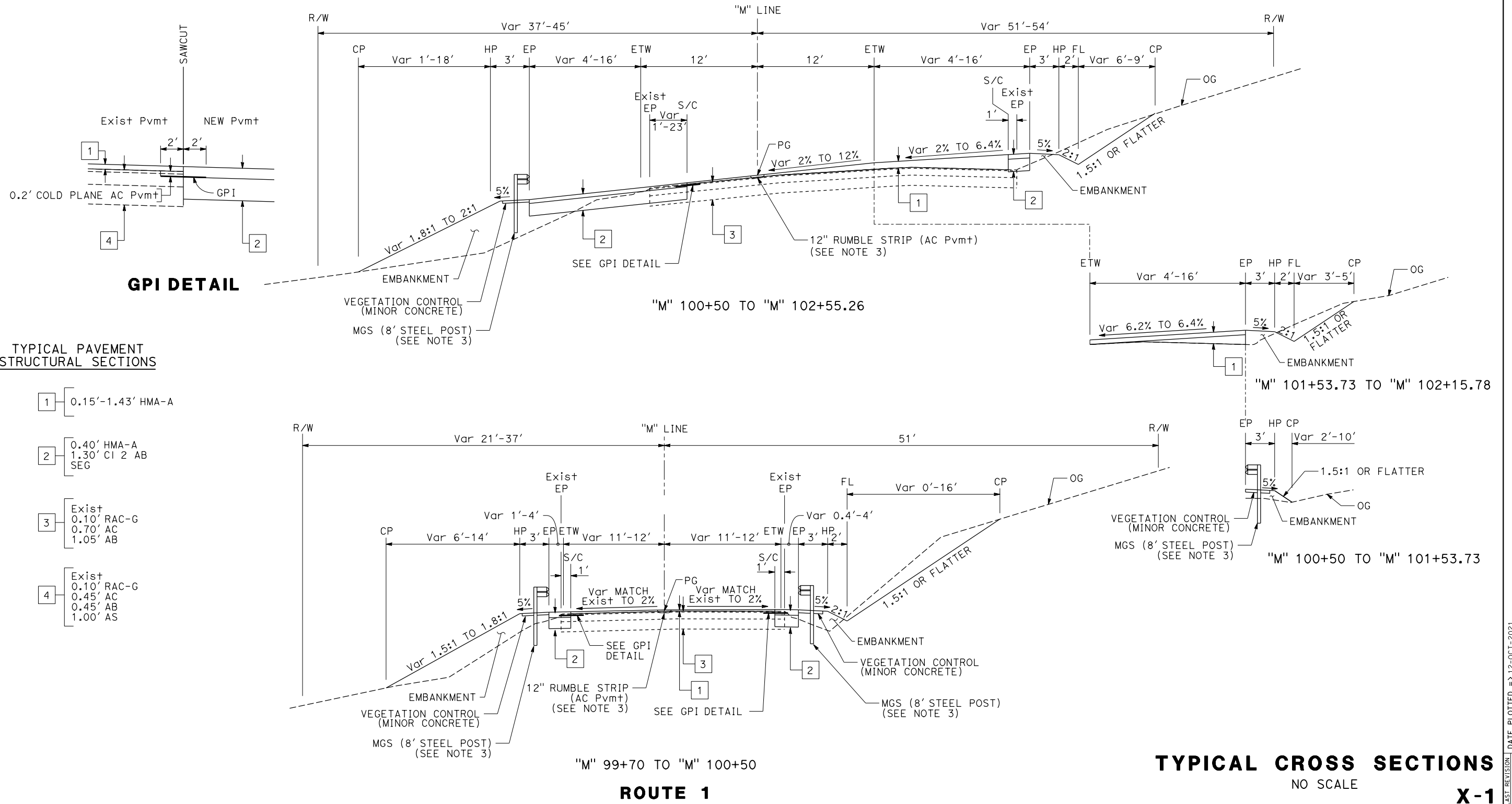
DESIGN DESIGNATION

ADT (2021)	3,360	D	68%
ADT (2041)	3,560	T	5.0%
DHV	520	V	55 mph
		TI ₂₀	8.5

PAVEMENT CLIMATE REGION: NORTH COAST

ABBREVIATIONS:


GPI	GEOSYNTHETIC PAVEMENT INTERLAYER (PAVING FABRIC)
HMA-A	HOT MIX ASPHALT (TYPE A)
RAC-G	RUBBERIZED ASPHALT CONCRETE (GAP GRADED)
SEG	SUBGRADE ENHANCEMENT GEOTEXTILE, CLASS B2
TE	TAPERED EDGE



Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
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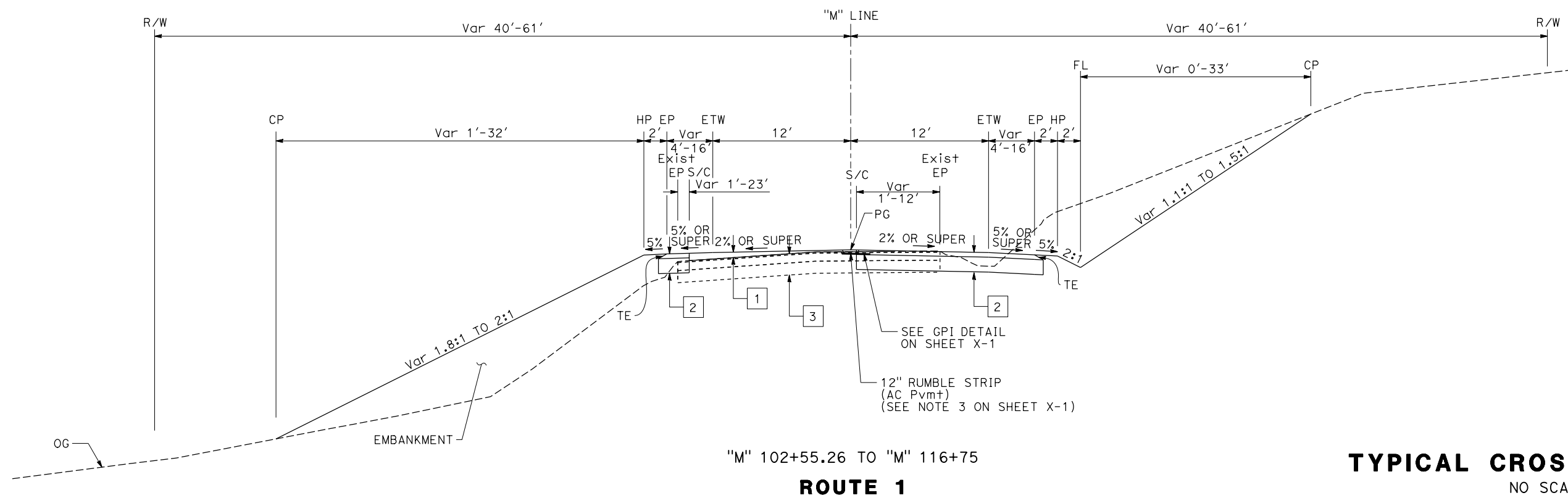
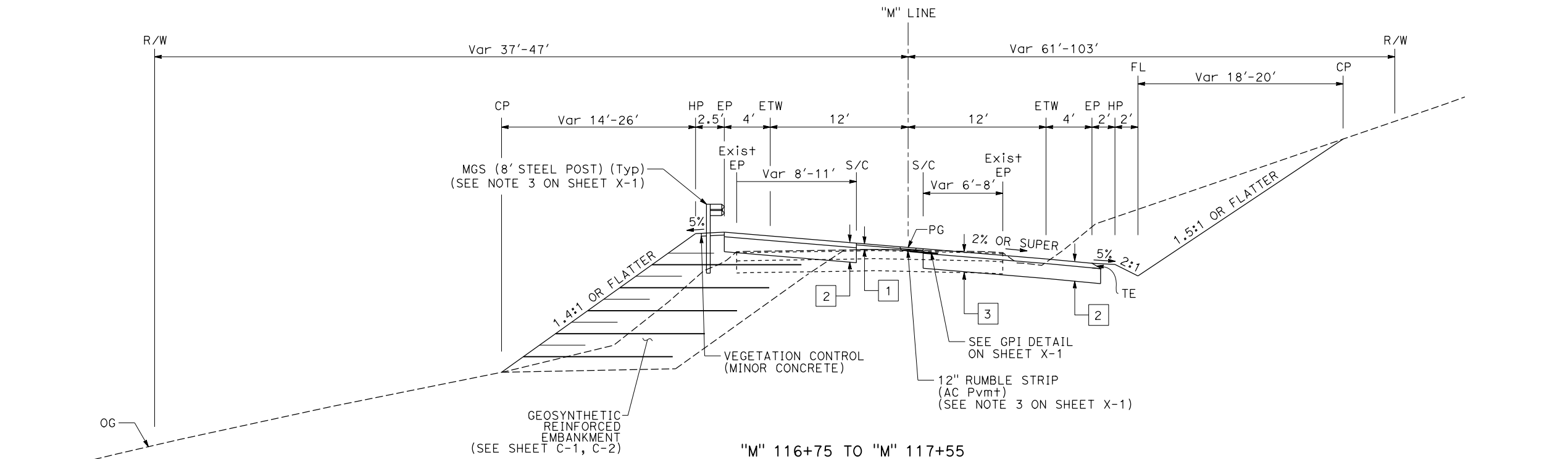
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NOTES:

1. FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.
2. FOR GEOSYNTHETIC REINFORCED EMBANKMENT DETAILS,
SEE CONSTRUCTION DETAILS SHEETS C-1 TO C-2.
3. FOR MGS POST OMISSION DETAILS,
SEE CONSTRUCTION DETAILS SHEET C-6.

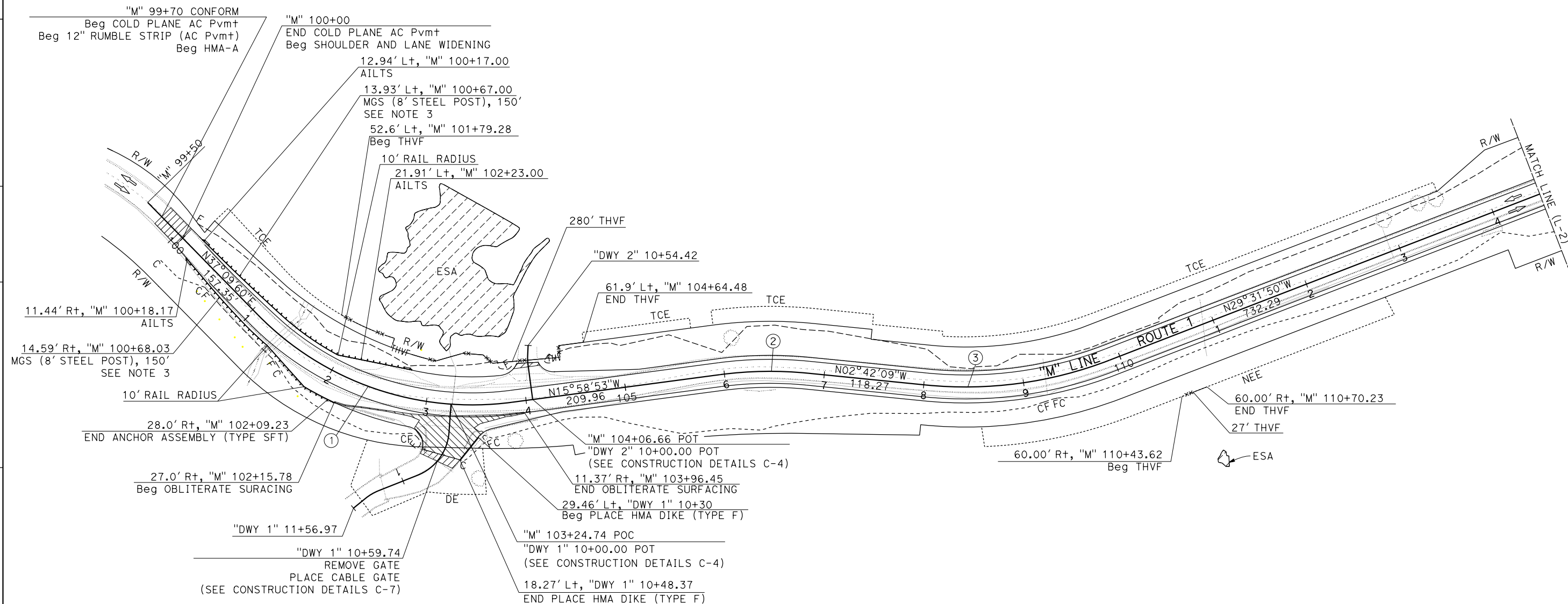
LEGEND:



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ABBREVIATIONS:

AILTS	ALTERNATIVE IN-LINE TERMINAL SYSTEM
DE	DRAINAGE EASEMENT
GRE	GEOSYNTHETIC REINFORCED EMBANKMENT
HMA-A	HOT MIX ASPHALT (TYPE A)
NEE	NON EXCLUSIVE EASEMENT



CURVE DATA						
No. ⊕	R	Δ	T	L	BC	EC
1	300.00'	53°08'53.09"	150.06'	278.28'	"M" 101+07.35	"M" 103+85.63
2	380.00'	13°16'43.92"	44.23'	88.07'	"M" 105+95.59	"M" 106+83.66
3	400.00'	26°49'40.24"	95.40'	187.29'	"M" 108+01.93	"M" 109+89.23

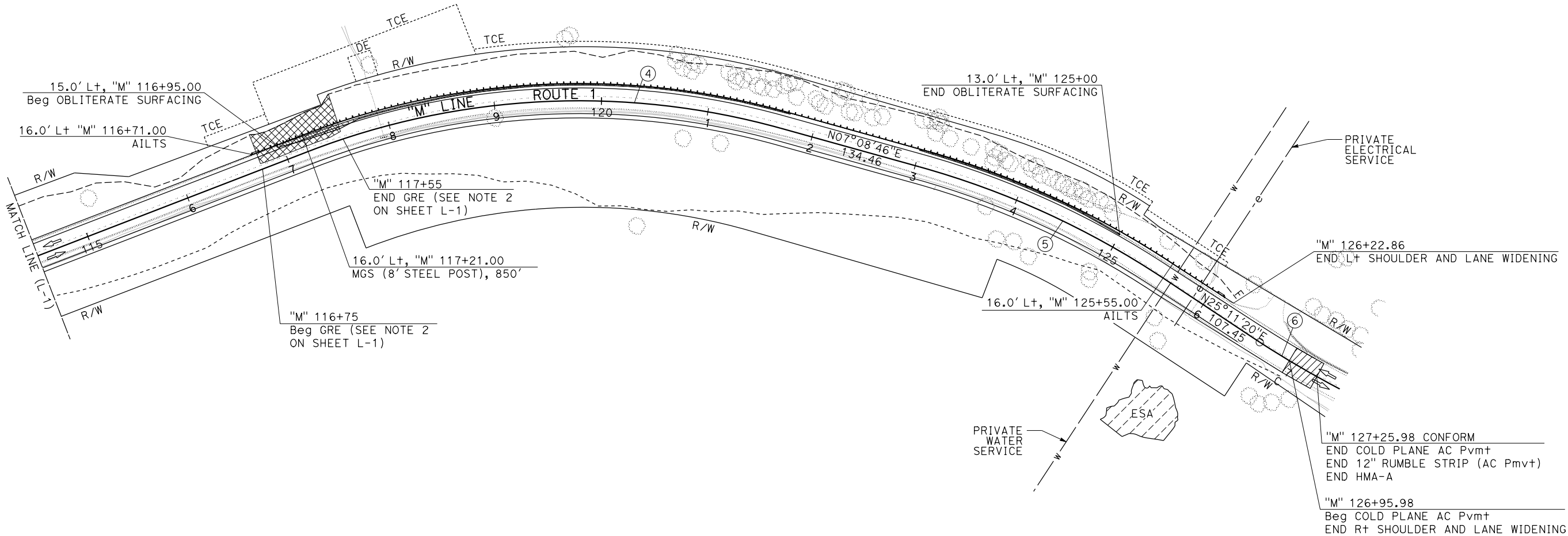
LAYOUT
SCALE: 1" = 50'

L-1

NOTE:

1. FOR ACCURATE RIGHT OF WAY DATA, CONTACT RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.

CURVE DATA						
No.	⊕	R	Δ	T	L	BC
4		700.00'	36°40'35.73"	232.02'	448.09'	"M" 117+21.51
5		800.00'	18°02'33.41"	127.01'	251.92'	"M" 123+04.06
6		931.99'	26°06'45.18"	216.13'	424.76'	"M" 126+63.44
						"M" 121+69.60
						"M" 125+55.98



LAYOUT
SCALE: 1" = 50'

L-2

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

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REGISTERED PROFESSIONAL ENGINEER

JON R. MCKEAN

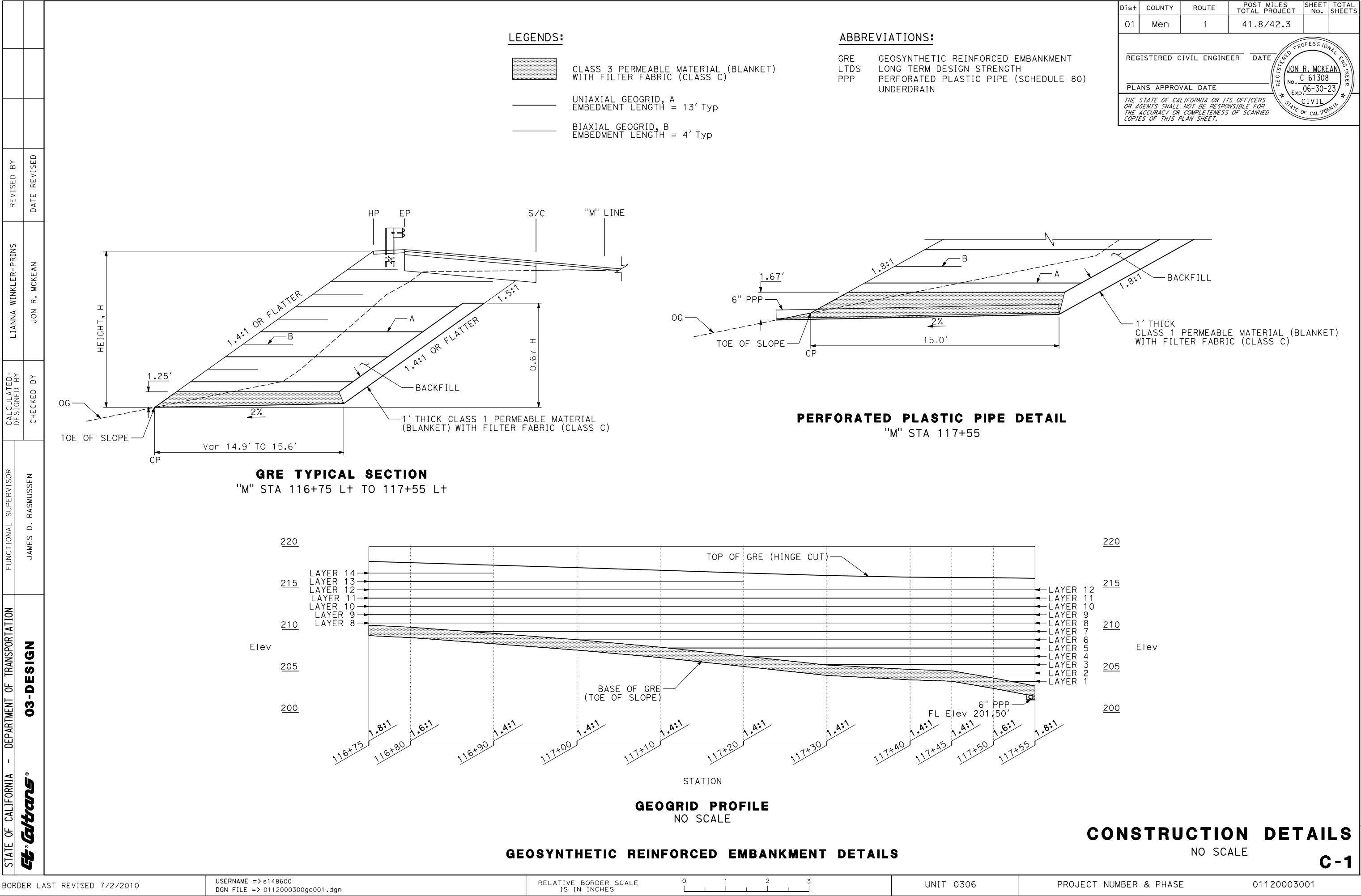
No. C 61308

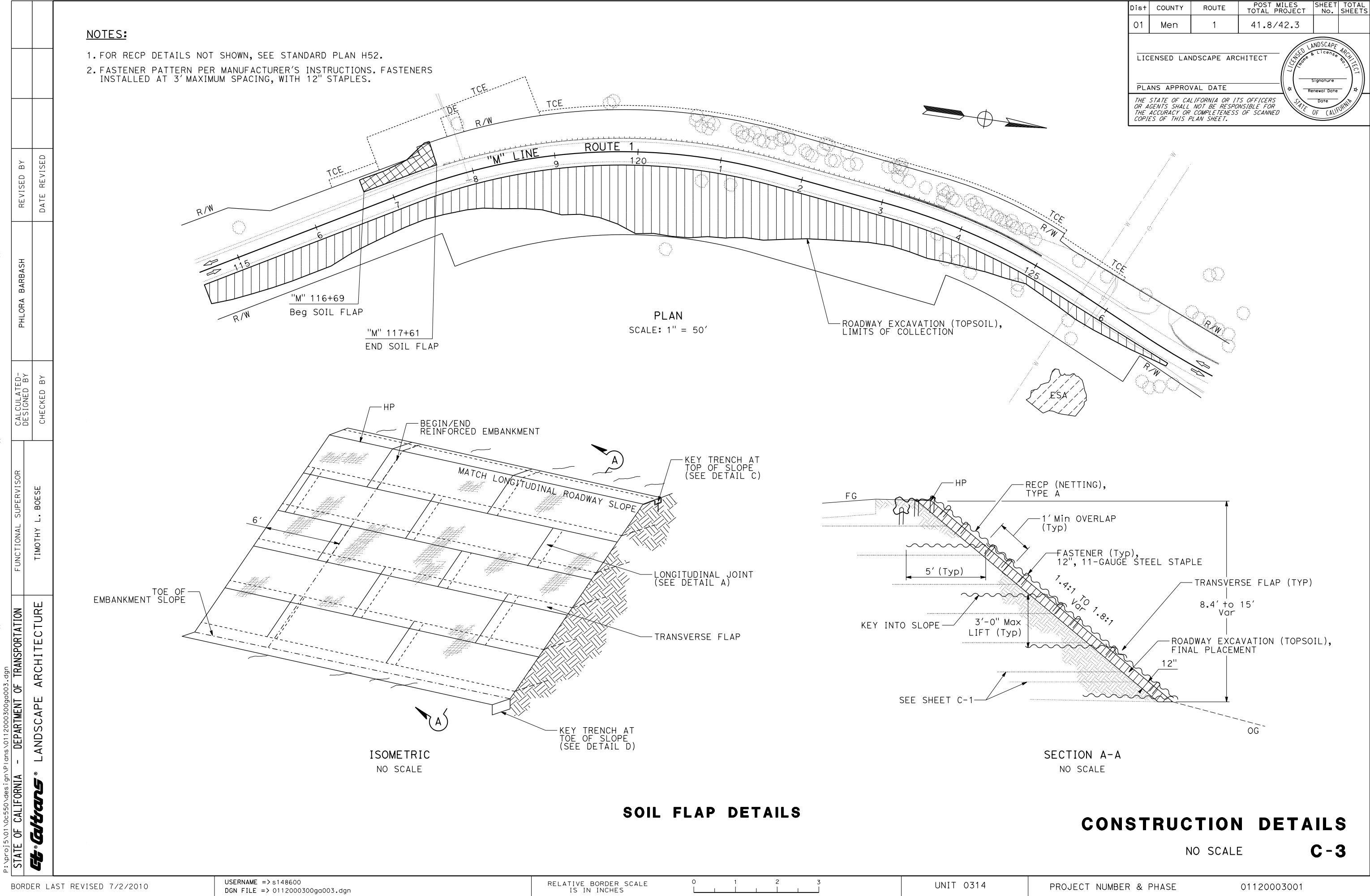
Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION		03-DESIGN		FUNCTIONAL SUPERVISOR JAMES D. RASMUSSEN		CALCULATED- DESIGNED BY CHECKED BY		JASON LIU JON R. MCKEAN		REVISED BY DATE REVISED		Dist		COUNTY	ROUTE	POST MILES TOTAL PROJECT		SHEET No.	TOTAL SHEETS								
												01	Men	1	41.8/42.3												
												REGISTERED CIVIL ENGINEER		DATE		<div>REGISTERED PROFESSIONAL ENGINEER JON R. MCKEAN No. C 61308 Exp. 06-30-21 CIVIL STATE OF CALIFORNIA</div> <p>THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.</p>											
												PLANS APPROVAL DATE															
STATION		10+00																		1		10+00		1		TOTAL	
CY	Exc	<div>← 40 →</div>																		13		5		53			
	Emb	<div>← 12 →</div>																		5		17					





DATE PLOTTED => 13-OCT-2021	LAST REVISION
TIME PLOTTED => 10:50	08-15-20

1. FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.

HMA-A HOT MIX ASPHALT (TYPE A)

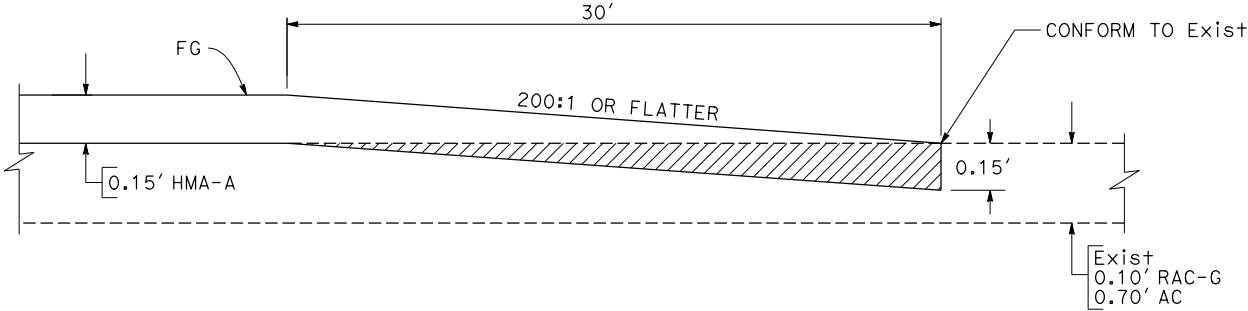
 COLD PLANE AC Pvm+ (0.15' Max)

⊗	OFFSET	STATION	ELEVATION
a	29.46',L+	"DWY 1" 10+30.03	229.62
b	27.11',R+	"M" 103+57	229.28
c	24.30',R+	"M" 103+64.09	228.94
d	28.00',R+	"M" 102+87.16	231.62
e	34.05',R+	"M" 102+99.04	231.44
f	19.25',R+	"DWY 1" 10+82.21	232.45
g	23.83',L+	"M" 104+31.07	224.03
h	27.39',L+	"M" 104+23.74	223.69
i	11.82',R+	"DWY 2" 10+33	223.35
j	14.94',L+	"DWY 2" 10+33	224.44
k	29.27',L+	"M" 103+85.13	224.80
l	28.00',L+	"M" 103+77	225.19

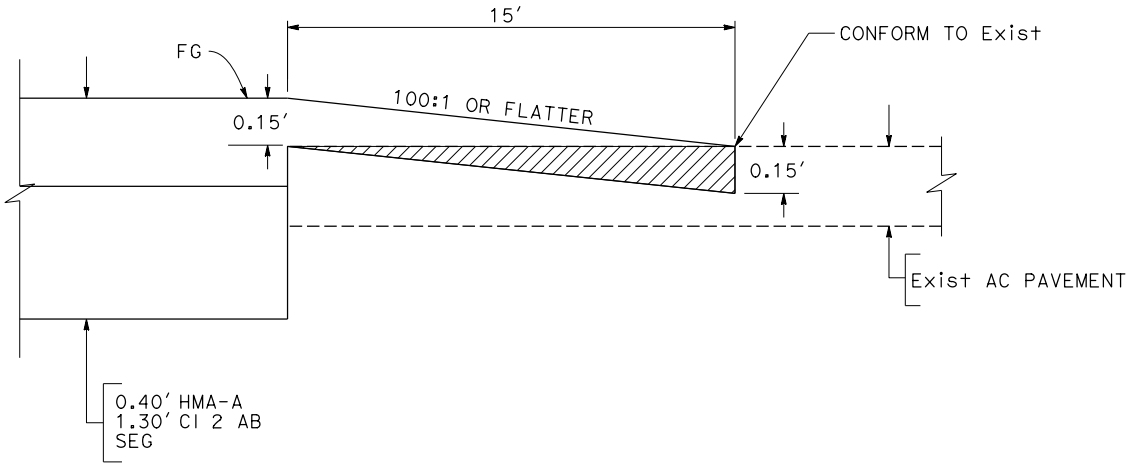
No. ④	R	T	Δ	L	BC	EC
1	300.00'	53°08'53.09"	150.06'	278.28'	"M" 101+07.35	"M" 103+85.63
7	50.00'	64°19'45.13"	31.44'	56.14'	"DWY 1" 10+28.24	"DWY 1" 10+84.37
8	50.00'	17°29'14.38"	7.69'	15.26'	"DWY 1" 11+26.11	"DWY 1" 11+41.37
9	50.00'	10°10'14.23"	4.45'	8.88'	"DWY 2" 10+35.19	"DWY 2" 11+44.06
10	25.00'	37°42'08.03"	8.54'	16.45'		
11	18.00'	109°12'44.23"	25.33'	34.31'		
12	16'	66°30'25"	10.77'	19.07'		
13	20'	60°04'13"	11.81'	21.42'		

CONSTRUCTION DETAILS

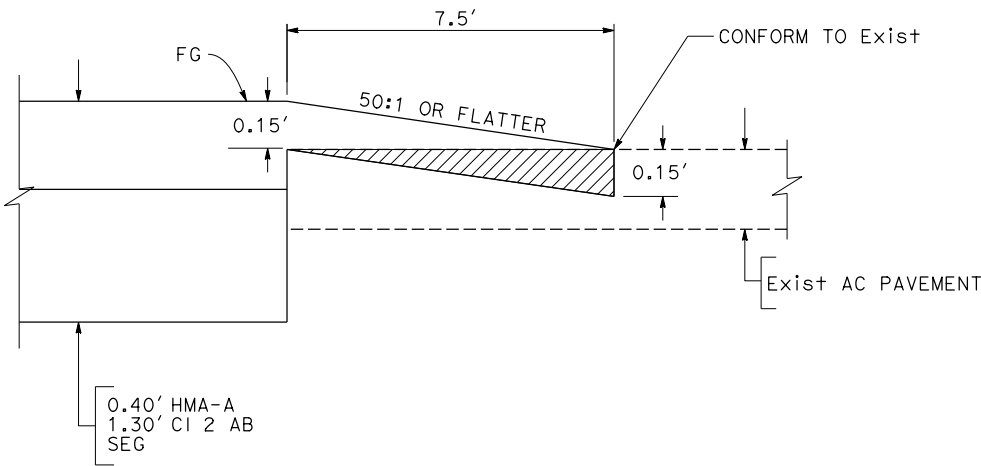
STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION	03-DESIGN	JAMES D. RASMUSSEN	CALCULATED-DESIGNED BY	CHECKED BY	JASON LIU	JON R. MCKEAN	REVISED BY	DATE	REVIS	DATE



ROUTE 1 AT OVERLAY LIMITS
PAVEMENT CONFORM



LOCAL ROAD PAVEMENT CONFORM



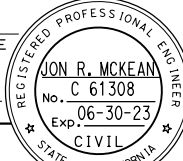
PRIVATE PAVED DRIVEWAY
PAVEMENT CONFORM

ABBREVIATIONS:

HMA-A HOT MIX ASPHALT (TYPE A)
RAC-G RUBBERIZED ASPHALT CONCRETE (GAP GRADED)

LEGEND:

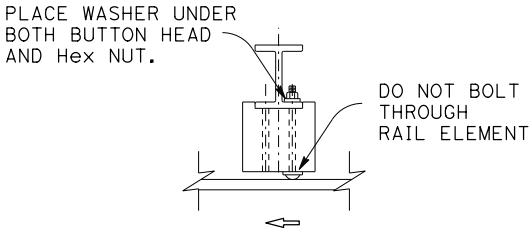
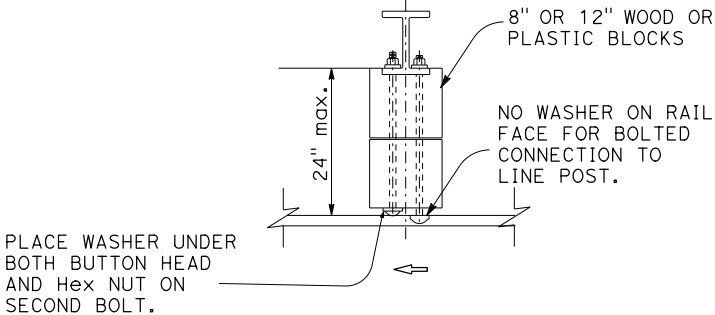
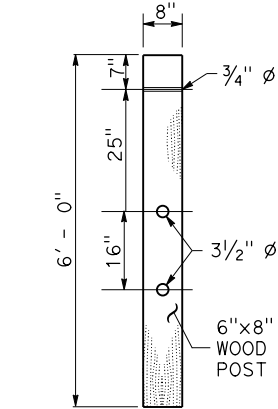
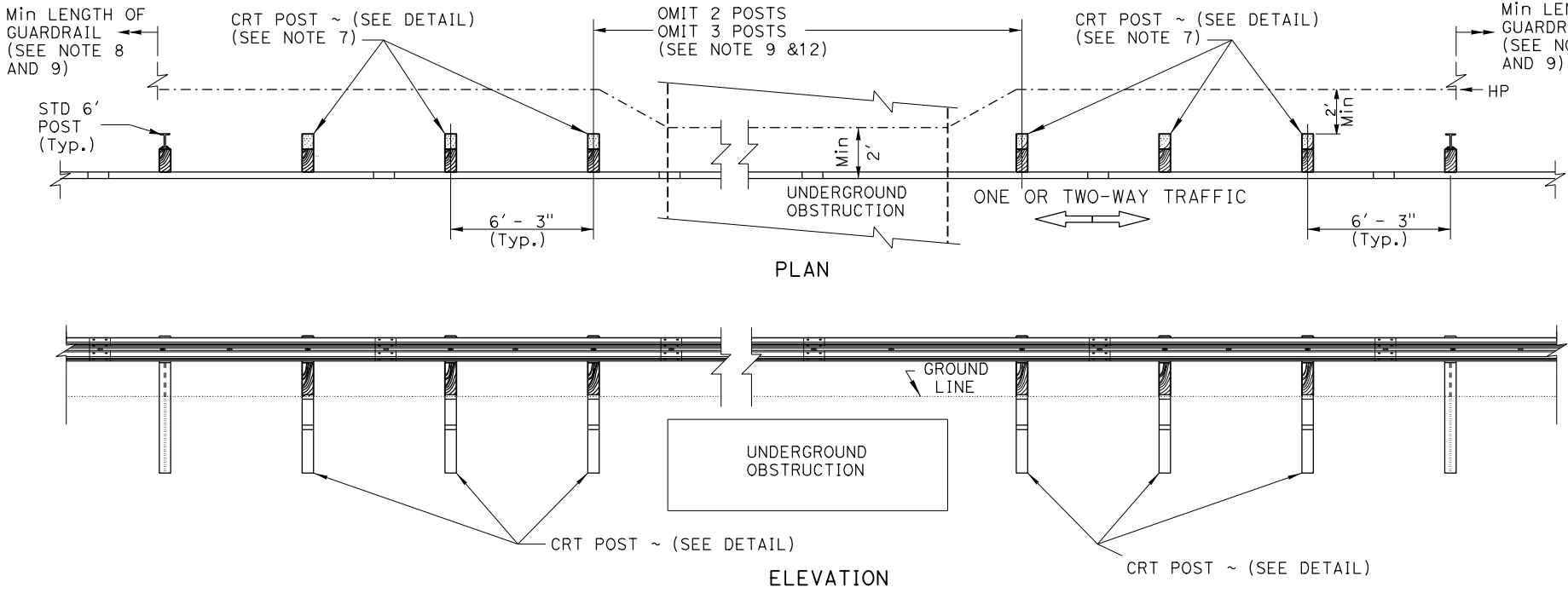
COLD PLANE AC Pvm+
(0.15' Max)

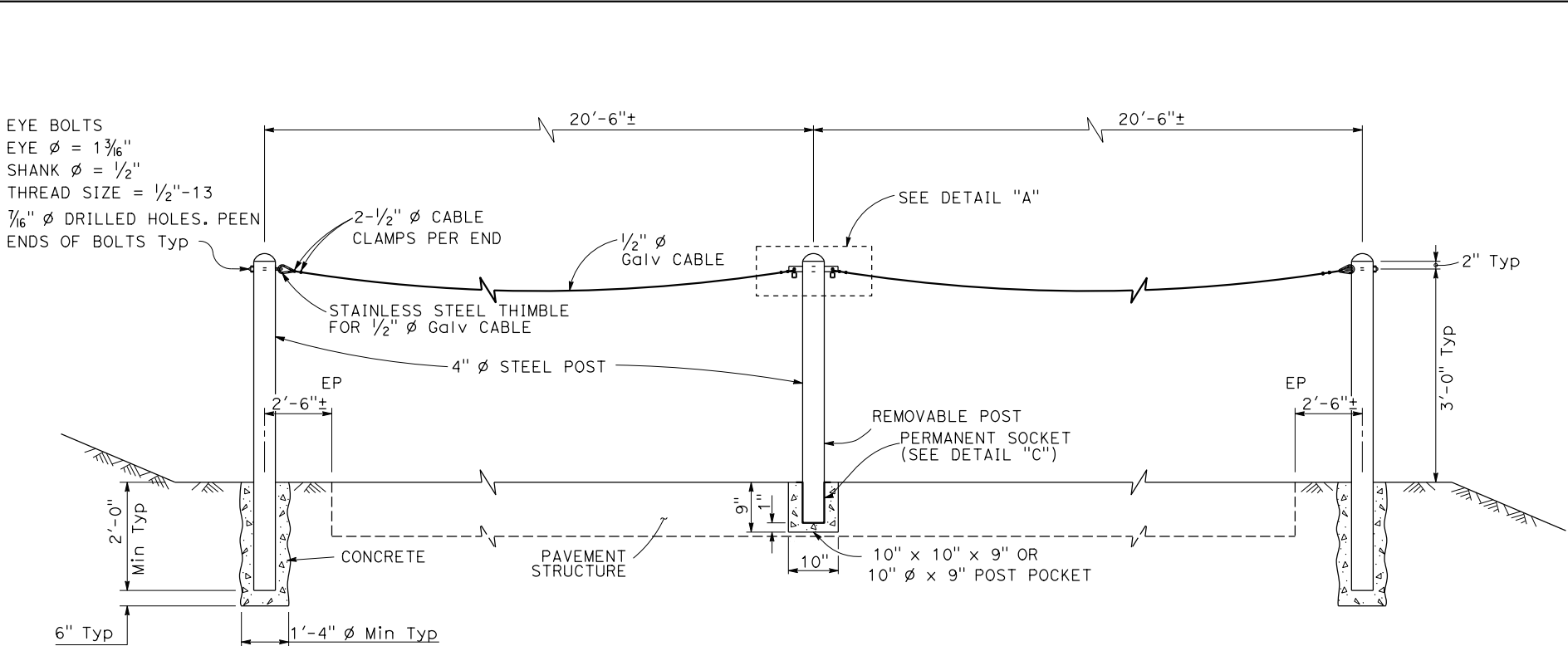
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REGISTERED CIVIL ENGINEER			DATE		
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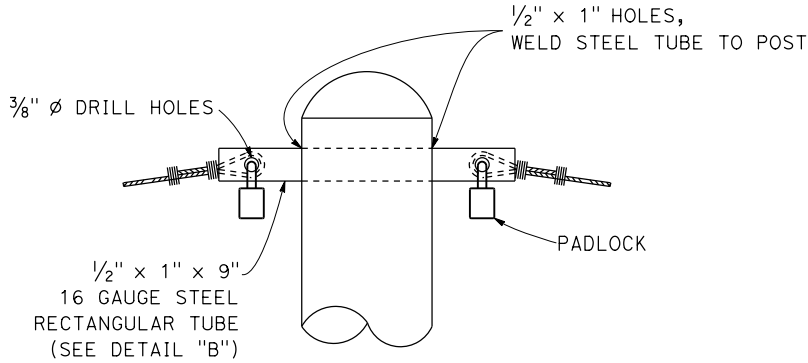
NOTES:

1. DETAILS SHOWN ON THIS SHEET DO NOT APPLY TO TRANSITIONS OR TERMINAL SYSTEMS. FOLLOW MANUFACTURER'S INSTRUCTIONS, DRAWINGS AND AS DESCRIBED.
2. A SINGLE LINE POST MAY BE OFFSET UP TO 12" ALONG THE RAIL. SEE NOTE 4.
3. A MAXIMUM 24" OF BLOCKS MAY BE USED TO MOVE POST BACK TO AVOID CONFLICT WITH AN UNDERGROUND OBSTACLE.
4. ATTACH GUARDRAIL ELEMENT TO POST AND BLOCK ONLY WHEN THERE IS A MANUFACTURED SLOT FOR THE BOLT. DO NOT FIELD CUT OR DRILL ELEMENT UNLESS SHOWN OR AUTHORIZED. BOLT ONLY BLOCK TO POST IF THERE IS NO SLOT IN ELEMENT. SEE NO SLOT BLOCK BOLTING DETAIL.
5. POST OMISSION DETAIL FOR UNDERGROUND OBSTRUCTIONS ONLY. NOT FOR USE AT FIXED OBJECTS.
6. CRT POST SHALL BE WOOD AND INCLUDED WITH MGS. NOT TO BE USED WITH NOTES 2 THROUGH 4 AND 12.
7. A SINGLE POST OF MGS MAY BE REMOVED WITH NO CRT POSTS REQUIRED. A MINIMUM OF 25 FEET OF STANDARD MGS IS REQUIRED BEFORE ANOTHER POST CAN BE REMOVED. A TERMINAL CAN BE PLACED OR SPECIAL GUARDRAIL FEATURE.
8. WHEN MORE THAN ONE POST IS REMOVED, PLACE A MINIMUM LENGTH OF 50 FEET OF MGS BEFORE PLACING: A TERMINAL, END ANCHOR, TRANSITION, OVERSIZED POST SPECIAL GUARDRAIL FEATURE, OR REMOVING ANOTHER POST.
9. FOR DETAILS NOT SHOWN, SEE STANDARD PLANS.
10. EXISTING UTILITY FACILITIES HAVE NOT BEEN INCLUDED ON THESE PLANS.
11. USE A 25' GUARDRAIL ELEMENT WHEN 3 POSTS ARE REMOVED TO SPAN THE OMITTED POSTS.
12. WHEN AN ADDITIONAL POST FALLS AT A RAIL ELEMENT SPLICE OR ANY OTHER LAPPED RAIL, DO NOT ATTACH RAIL TO BLOCK EVEN IF THERE IS A SLOT. USE LAPPED RAIL BLOCK BOLTING DETAIL.





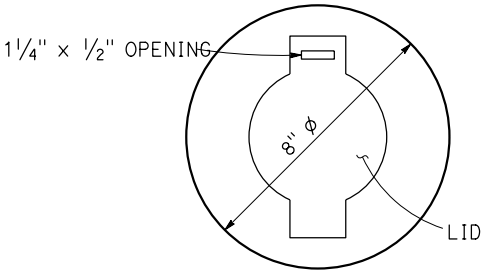
CABLE GATE DETAIL
ELEVATION



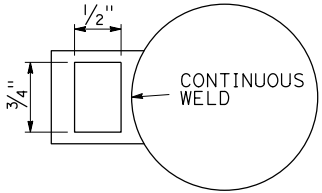
DETAIL "A"



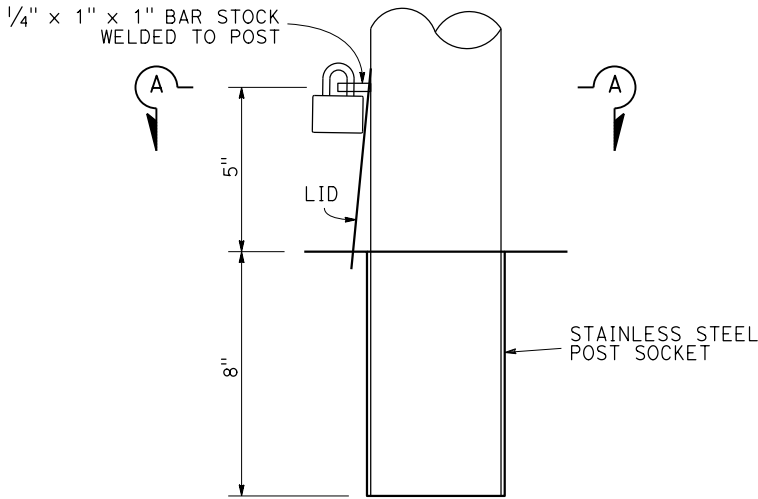
DETAIL "B"




PLAN



SECTION A-A



ELEVATION
DETAIL "C"

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A circular professional engineer seal for the State of California. The outer ring contains the text "REGISTERED PROFESSIONAL ENGINEER" at the top and "STATE OF CALIFORNIA" at the bottom, separated by two stars. The center of the seal contains the name "JON R. MCKEAN", the license number "No. C 61308", the expiration date "Exp. 06-30-23", and the word "CIVIL" at the bottom.

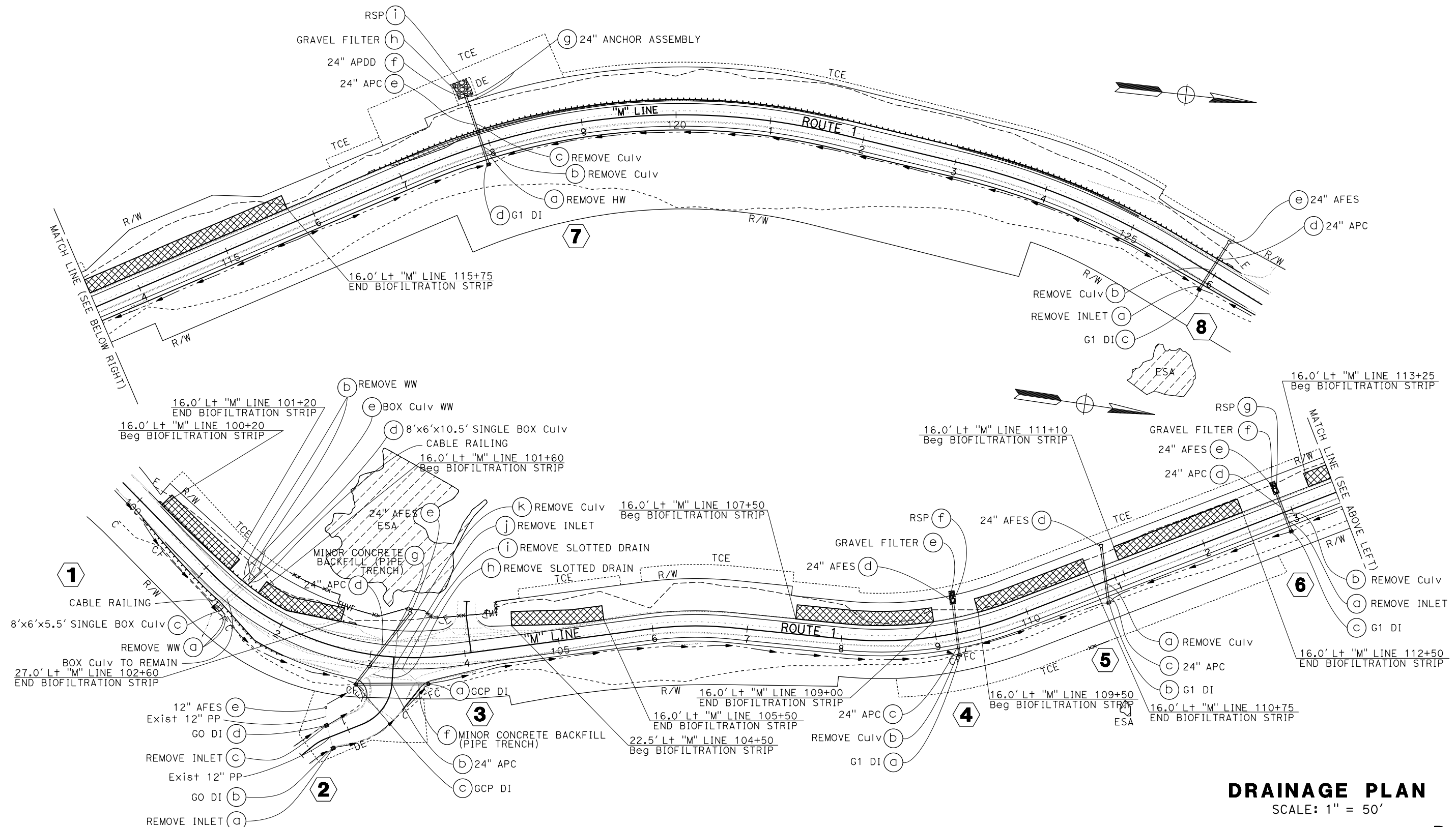
NOTE:

1. FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.
2. BIOSTRIP LOCATIONS FOR INFORMATION PURPOSES ONLY,
NO ADDITIONAL CONSTRUCTION PROPOSED.

ABBREVIATIONS:

APDD	ALTERNATIVE PIPE DOWNDRAIN
DE	DRAINAGE EASEMENT
BIOST	BIOFILTRATION STRIP

LEGEND:



APPROVED FOR DRAINAGE WORK ONLY

DRAINAGE PLAN

SCALE: 1" = 50'

D-1

DATE PLOTTED => 13-OCT-2021	TIME PLOTTED => 11:19
08-29-20	

BORDER LAST REVISED 7/2/2010

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USERNAME => s148600
DGN FILE => 0112000300ia001.dgn

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RELATIVE BORDER SCALE
IS IN INCHES

	0	1	2

UNIT 0306

PROJECT NUMBER & PHASE

01120003001

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STATE OF CALIFORNIA

Caltrans®

DEPARTMENT OF TRANSPORTATION

03-DESIGN

FUNCTIONAL SUPERVISOR
JAMES D. RASMUSSEN

CALCULATED-DRAWN BY
CHECKED BY

REVISIONS

CHRISTOPHER SUGAR
JON R. MCKEAN

DATE
REVISED

Dist

COUNTY

ROUTE

POST MILES TOTAL PROJECT

SHEET No.

TOTAL SHEETS

01Men141.8/42.3

REGISTERED CIVIL ENGINEER DATE

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JON R. MCKEAN
No. C 61308
Exp. 06-30-23
CIVIL
STATE OF CALIFORNIA

DRAINAGE SYSTEM No. 7

"M" 117+92.25/PM 42.11
01°12'12" SKEW

(1/4 T, CLASS V, METHOD B)
LENGTH = 17.5'
WIDTH = 16.0'
DEPTH = 3.0'

RSP

GRAVEL FILTER

55.55' Lt "M" 117+90.97
FL Elev 190.52

24" x 15.0' APDD

24" ANCHOR ASSEMBLY

45.79' Lt "M" 117+91.16
FL Elev 201.91
46° ELBOW

REMOVE CULVERT (18" x 33.4' CMP)

FG

"M" LINE

20.50' Rt "M" 117+92.47
FL Elev 205.03

24" x 66.4' APC

REMOVE HEADWALL

REMOVE CULVERT (18" x 34' PP)

TYPE G1 DI (H=6.5')
GRATE TYPE 24-9
GRATE Elev 211.53

OG

S=4.70%

S=75.93%

TCE

DE

DRAINAGE SYSTEM No. 8

"M" 125+94.52/PM 42.26
00°53'18" SKEW

36.01' Lt "M" 125+95.08
FL Elev 221.65

24° AFES

24" x 55.9' APC

S=2.00%

FG

"M" LINE

19.88' Rt "M" 125+94.21
FL Elev 222.77

REMOVE CULVERT (18" x 38.4' CMP)

REMOVE INLET

TYPE G1 DI (H=4.0')
GRATE TYPE 24-9
GRATE FL Elev 226.78

OG

DRAINAGE PROFILES

SCALE: Horiz 1" = 10'
Vert 1" = 10'

DP-4

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

03-DESIGN

FUNCTIONAL SUPERVISOR

JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY

CHECKED BY

CHRISTOPHER SUGAR

JON R. MCKEAN

REVISED BY

DATE

REVISED

REVISED

ALTERNATIVE PIPE CULVERT (APC),
ALTERNATIVE PIPE DOWNDRAIN (APDD), AND
ALTERNATIVE FLARED END SECTION (AFES)
ALLOWABLE PIPE MATERIAL AND PROTECTION

DRAINAGE SYSTEM No.	STATION	TYPE		
		HDPE	CORRUGATED STEEL PIPE (0.109" THICK)	RCP
2	"DWY 1" 11+21		X	
3	"M" 103+08		X	
4	"M" 109+22	X	X	X
5	"M" 110+84	X	X	X
6	"M" 112+91	X	X	X
7	"M" 117+92		X	
8	"M" 125+95	X	X	X

LIMITS OF MEASUREMENT
FOR PAYMENT

MARKER (CULVERT)

DRAINAGE SYSTEM No.	PM	MARKER (CULVERT)
		EA
1	41.79	L+/R+
3	41.83	L+/R+
4	41.95	L+/R+
5	41.98	L+/R+
6	42.02	L+/R+
7	42.11	L+/R+
8	42.26	L+/R+

MARKER (CULVERT) DETAIL

NOTE:
EXACT LOCATION TO BE DETERMINED BY THE ENGINEER.

TYPICAL RSP WITH ALTERNATIVE FES (OUTLET)
(FOR ADDITIONAL DETAILS SEE DRAINAGE
PROFILE AND PLAN FOR EACH SYSTEM)

SECTION C-C

SECTION D-D

DRAINAGE DETAILS

NO SCALE

DD-1

Dist

COUNTY

ROUTE

POST MILES
TOTAL PROJECT

SHEET No.

TOTAL SHEETS

01

Men

1

41.8/42.3

REGISTERED CIVIL ENGINEER

DATE

PLANS APPROVAL DATE

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REGISTERED PROFESSIONAL ENGINEER

JON R. MCKEAN

No. C 61308

Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA

BORDER LAST REVISED 7/2/2010

USERNAME => s148600
DGN FILE => 01120003001c001.dgn

RELATIVE BORDER SCALE
IS IN INCHES

0

1

2

3

UNIT 0306

PROJECT NUMBER & PHASE

01120003001

DATE PLOTTED => 12-OCT-2021


TIME PLOTTED => 17:04

LAST REVISION

08-29-20

Exhibit 4 Page 23 of 46

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION



03-DESIGN

FUNCTIONAL SUPERVISOR

JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY

CHECKED BY

CHRISTOPHER SUGAR

JON R. MCKEAN

REVISED BY

DATE REVISED

ABBREVIATIONS:

S - STANDARD JOINT
D - DOWNDRAIN JOINT

DRAINAGE QUANTITIES

DRAINAGE SHEET No.	DRAINAGE SYSTEM No.	DRAINAGE UNIT	REMOVE CULVERT	REMOVE HEADWALL	REMOVE INLET	REMOVE SLOTTED DRAIN	REMOVE WINGWALL	24" ALTERNATIVE PIPE CULVERT	24" ALTERNATIVE PIPE DOWNDRAIN	36" REINFORCED CONCRETE PIPE	12" ALTERNATIVE FLARED END SECTION	24" ALTERNATIVE FLARED END SECTION	CONCRETE BACKFILL (PIPE TRENCH)	ROCK SLOPE PROTECTION (150 LB, CLASS III, METHOD B)	ROCK SLOPE PROTECTION (300 LB, CLASS IV, METHOD B)	ROCK SLOPE PROTECTION (1/4 T, CLASS V, METHOD B)	GRAVEL FILTER	24" ANCHOR ASSEMBLY	CABLE RAILING	STRUCTURAL CONCRETE, BOX CULVERT	STRUCTURAL CONCRETE, WINGWALL	STRUCTURAL CONCRETE, DRAINAGE INLET	MISCELLANEOUS IRON AND STEEL	JOINT CLASSIFICATION	HEIGHT OF INLET	MAXIMUM COVER	DRAINAGE INLET MARKER *	MARKER (CULVERT)	DESCRIPTION	STATION	DRAINAGE SHEET No.	DRAINAGE SYSTEM No.	DRAINAGE UNIT	
D-1	1	a					2																					2 - 11' X 7.6'	"M" 101+39.48	D-1	1	a		
		b					2																					2 - 11' X 10'				b		
		c																	8.0	4.84							3.5	1	8'X6'X5.5' SINGLE BOX Culv				c	
		d																	8.0	9.24							3.7	1	8'X6'X10.5' SINGLE BOX Culv				d	
		e																	23.2		26.97									WINGWALL (TYPE A)				e
D-1	2	a			1																									"DWY 1" 11+20.84	D-1	2	a	
		b																				1.30	239	S	3.2		1	TYPE GO DI, GRATE TYPE 24-12X				b		
		c			1																											c		
		d																				1.30	239	S	3.2		1	TYPE GO DI, GRATE TYPE 24-12X				d		
		e									1																					e		
D-1	3	a								4.8														236		3.5		1	TYPE GCP DI, GRATE TYPE 36R	"M" 103+07.54	D-1	3	a	
		b						74.0																	S		5.3						b	
		c								7.6														236		6.8		1	TYPE GCP DI, GRATE TYPE 36R				c	
		d						90.6																	S		6.2						d	
		e										1																1					e	
		f											0.84																				f	
		g											0.45																				g	
		h				1																							L = 38.4', Dia = 2"				h	
		i				1																							L = 35.8', Dia = 2"				i	
		j			1																												j	
		k	1																										REMOVE 18" x 38.3' CMP					k
SHEET TOTAL			1		3	2	4	164.6		12.4	1	1	1.29						39.2	14.08	26.97	2.60	950				2	5						

* STAMPED CONCRETE IMPRINT
(N) - NOT A SEPARATE BID ITEM

DRAINAGE QUANTITIES

DQ-1

BORDER LAST REVISED 7/2/2010

USERNAME => s148600
DGN FILE => 01120003001d001.dgn

RELATIVE BORDER SCALE
IS IN INCHES

01

Men

1

41.8/42.3

SHEET No.

TOTAL SHEETS

REGISTERED CIVIL ENGINEER DATE

PLANS APPROVAL DATE

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REGISTERED PROFESSIONAL ENGINEER

JON R. MCKEAN

No. C 61308

Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA

0

1

2

3

UNIT 0306

PROJECT NUMBER & PHASE

01120003001

DATE PLOTTED => 12-OCT-2021

TIME PLOTTED => 17:04

Exhibit 4 Page 25 of 46

DRAINAGE QUANTITIES

DRAINAGE SHEET No.	DRAINAGE SYSTEM No.	DRAINAGE UNIT	REMOVE CULVERT	REMOVE HEADWALL	REMOVE INLET	REMOVE SLOTTED DRAIN	REMOVE WINGWALL	24" ALTERNATIVE PIPE CULVERT	24" ALTERNATIVE PIPE DOWNDRAIN	36" REINFORCED CONCRETE PIPE	12" ALTERNATIVE FLARED END SECTION	24" ALTERNATIVE FLARED END SECTION	CONCRETE BACKFILL (PIPE TRENCH)	ROCK SLOPE PROTECTION (150 LB, CLASS III, METHOD B).	ROCK SLOPE PROTECTION (300 LB, CLASS IV, METHOD B).	ROCK SLOPE PROTECTION (1 1/4 T, CLASS V, METHOD B)	GRAVEL FILTER	24" ANCHOR ASSEMBLY	CABLE RAILING	STRUCTURAL CONCRETE, BOX CULVERT	STRUCTURAL CONCRETE, WINGWALL	STRUCTURAL CONCRETE, DRAINAGE INLET	MISCELLANEOUS IRON AND STEEL	(N)	(N)	(N)	*		DESCRIPTION	STATION	DRAINAGE SHEET No.	DRAINAGE SYSTEM No.	DRAINAGE UNIT			
D-1	7	a		1																										REMOVE 18" x 34' PP	"M" 117+92.25	D-1	7	a		
		b	1																											REMOVE 18" X 33.4' CMP				b		
		c	1																															c		
		d																					1.72	239		6.5		1	1	TYPE G1 DI, GRATE TYPE 24-12X				d		
		e						66.4																	S		10.7		1					e		
		f							15.0																	D								f		
		g																2																g		
		h																																	h	
		i														31.1	10.4																	i		
D-1	8	a			1																											"M" 125+94.52	D-1	8	a	
		b	1																											REMOVE 18" X 38.4' CMP					b	
		c																					1.17	239		4.0		1	1	TYPE G1 DI, GRATE TYPE 24-12X					c	
		d						55.9																	S		4.1								d	
		e										1																1							e	
SUB TOTAL			3	1	1			122.3	15.0			1				31.1		2					2.89	478				2	4							
SHEET DQ-1 TOTAL			1		3	2	4	164.6		12.4	1	1	1.29						39.2	14.08	26.97		2.60	950				2	5							
SHEET DQ-2 TOTAL			3		1			155.8				3		6.2	6.2		6.2					4.13	717					3	6							
TOTAL			7	1	5	2	4	442.7	15.0	12.4	1	5	1.29	6.2	6.2	31.1	16.6	2	39.2	14.08	26.97	9.62	2145				7	15								


* STAMPED CONCRETE IMPRINT
(N) - NOT A SEPARATE BID ITEM

DRAINAGE QUANTITIES

DQ-3

TREATMENT BEST MANAGEMENT PRACTICE (TBMP) MARKER QUANTITIES

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

03-DESIGN

FUNCTIONAL SUPERVISOR

JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY

CHECKED BY

DUNG SY

JON R. MCKEAN

REVISED BY

DATE

REVISED BY

DATE

NOTES:

1. FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE

PLANS APPROVAL DATE

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REGISTERED PROFESSIONAL ENGINEER

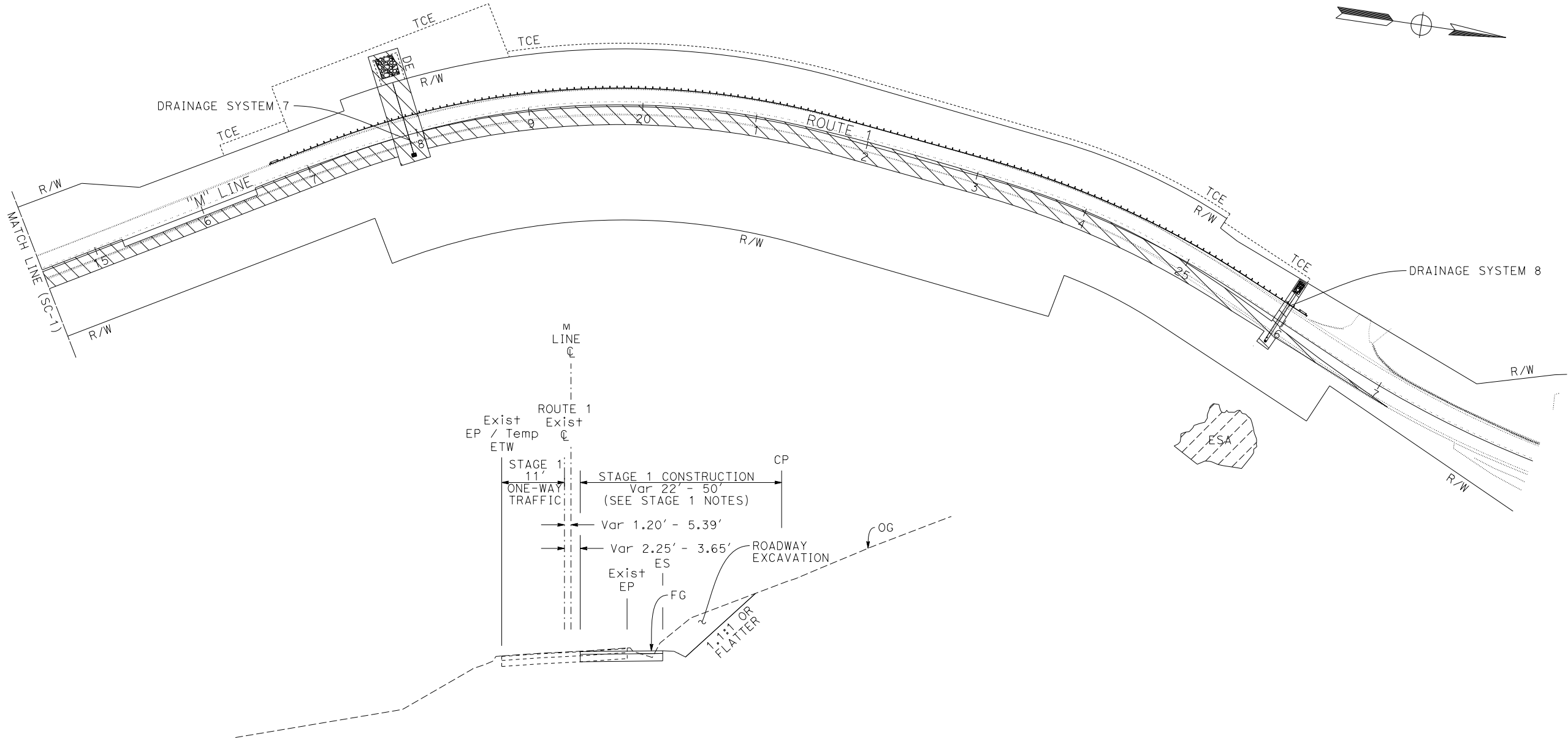
JON R. MCKEAN

No. C 61308

Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA



STAGE 1 TYPICAL SECTION
NO SCALE
"M" Sta 104+50 R+ TO "M" Sta 108+00 R+

STAGE CONSTRUCTION PLAN
STAGE 1
SCALE: 1"=50'
SC-2

APPROVED FOR STAGE CONSTRUCTION WORK ONLY

- NOTES:**
- FOR ACCURATE RIGHT OF WAY DATA, CONTACT RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.
 - FOR ADDITIONAL STAGE CONSTRUCTION NOTES, SEE STAGE CONSTRUCTION SHEET SC-1.

LEGEND:

STAGE 2 CONSTRUCTION

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE

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REGISTERED PROFESSIONAL ENGINEER

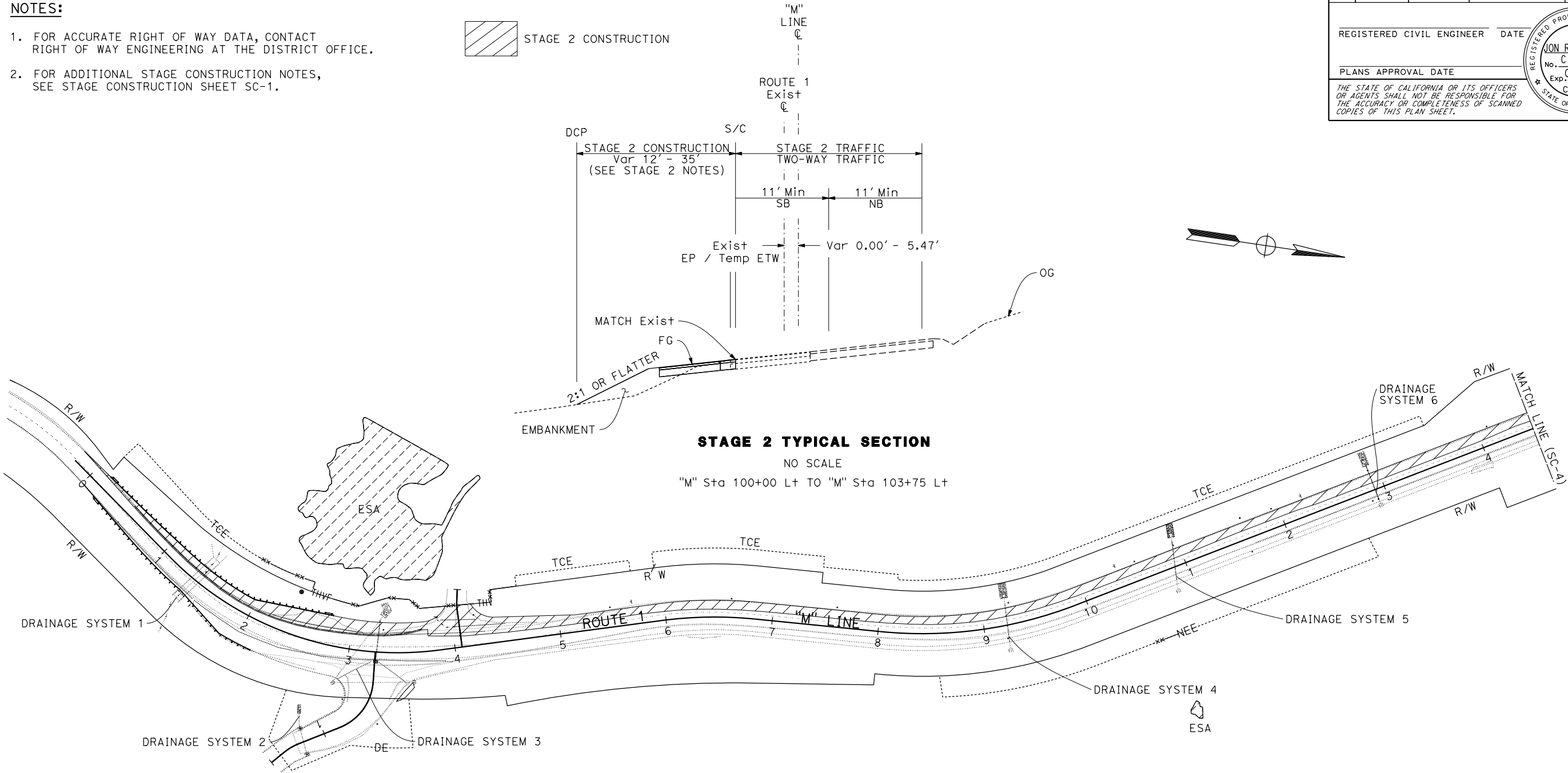
JON R. MCKEAN

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- WORK THIS STAGE**
STAGE 2 (SC-3 & SC-4)
- REMOVE CONSTRUCTION AREA SIGNS F & G.
 - CONSTRUCT GEOSYNTHETIC REINFORCED EMBANKMENT FROM "M" Sta 116+75 L+ TO "M" 117+55 L+.
 - CONTRACTOR TO PROVIDE 24 HOUR FLAGGING DURING CONSTRUCTION OF GRE AT Sta 116+75 TO 117+55.
 - CONSTRUCT GUARDRAIL FROM "M" L+ 100+17 TO 102+76, AND L+ 116+71 TO 126+12.

APPROVED FOR STAGE CONSTRUCTION WORK ONLY

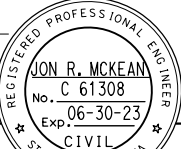
STAGE CONSTRUCTION PLAN
STAGE 2
SCALE: 1"=50'
SC-3

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE

PLANS APPROVAL DATE



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REGISTERED PROFESSIONAL ENGINEER
JON R. MCKEAN
No. C 61308
Exp. 06-30-23
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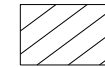
NOTES:

1. FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.
2. FOR ADDITIONAL STAGE CONSTRUCTION NOTES,
SEE STAGE CONSTRUCTION SHEET SC-1.

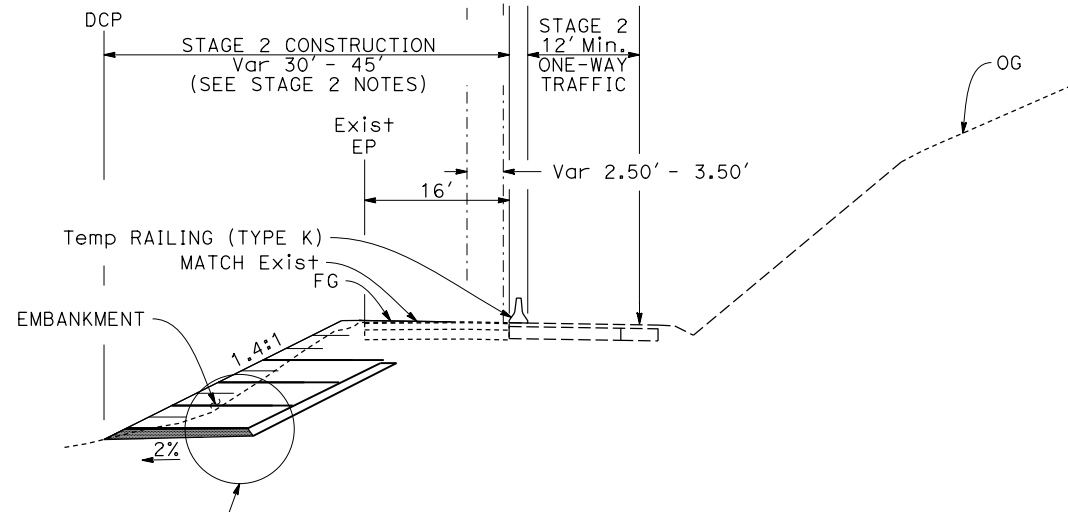
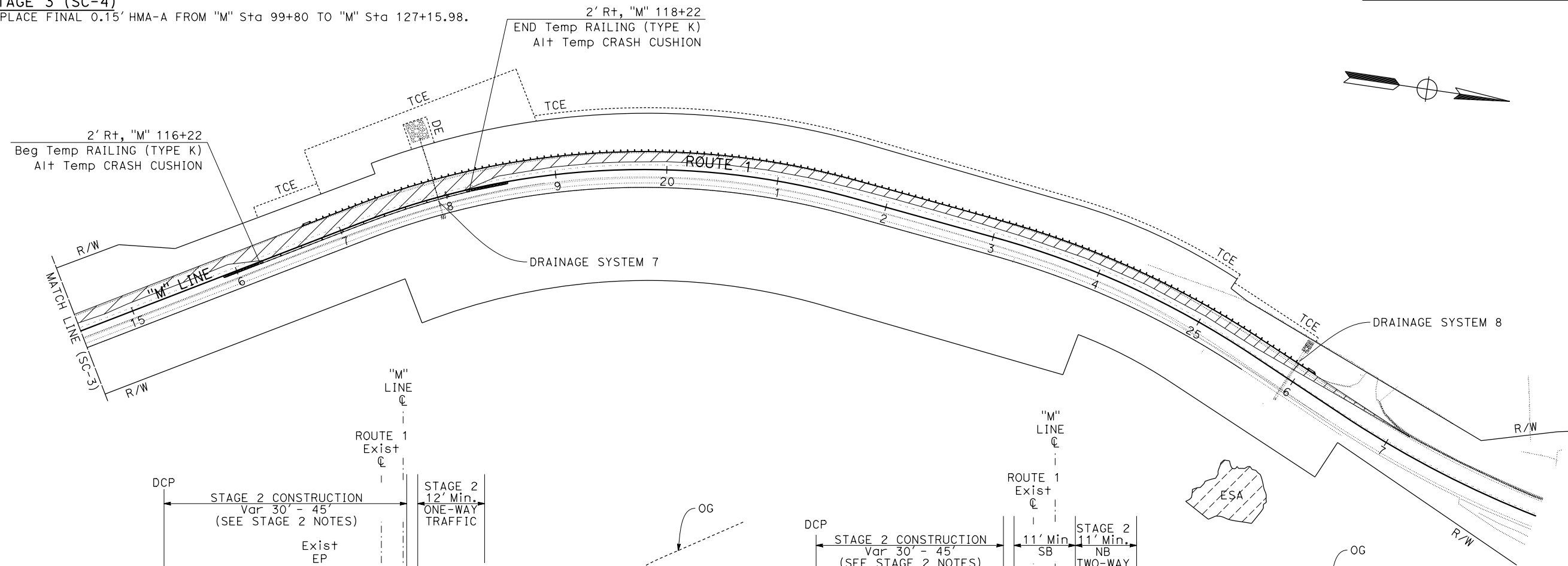
WORK THIS STAGE
STAGE 3 (SC-4)

- 1.PLACE FINAL 0.15' HMA-A FROM "M" Sta 99+80 TO "M" Sta 127+15.98.

LEGEND:



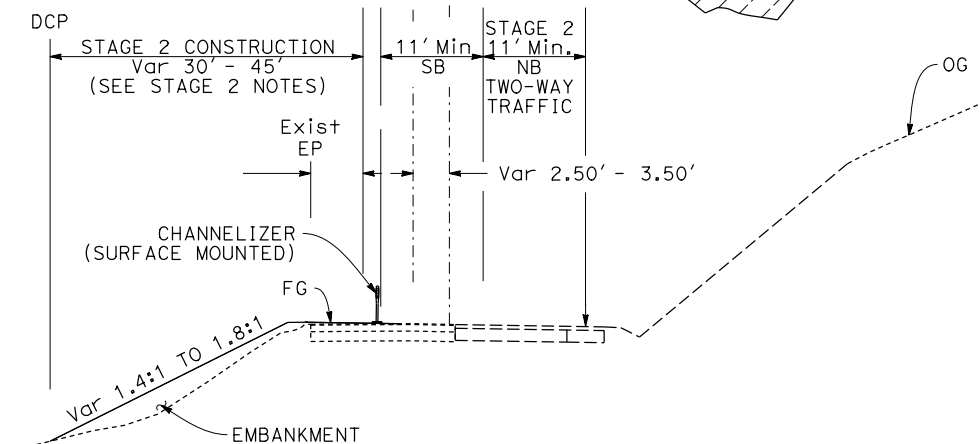
STAGE 2 CONSTRUCTION



STAGE 2 TYPICAL SECTION

NO SCALE

"M" Sta 116+75 Lt TO "M" Sta 117+55 Lt



STAGE 2 TYPICAL SECTION

NO SCALE

"M" Sta 103+75 L+ TO "M" Sta 116+75 L+
"M" Sta 117+55 L+ TO "M" Sta 127+15.98 L+

STAGE CONSTRUCTION PLAN

STAGE 2 & 3

SCALE: 1"=50'

SC-4 **LAST**

APPROVED FOR STAGE CONSTRUCTION WORK ONLY

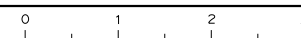
BORDER LAST REVISED 7/2/2010

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USERNAME => s148600
DGN FILE => 0112000300ma004.dgn

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RELATIVE BORDER SCALE
IS IN INCHES



UNIT 0306

PROJECT NUMBER & PHASE

01120003001

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

03-DESIGN

ST-Galtrans

FUNCTIONAL SUPERVISOR

JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY

CHECKED BY

TUONGVY S. NGUYEN

JON R. MCKEAN

REVISED BY

DATE REVISED

NOTE:
FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE

PLANS APPROVAL DATE

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JON R. MCKEAN

No. C 61308

Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA

STAGE CONSTRUCTION AND TRAFFIC HANDLING QUANTITIES

SHEET No.	STATION	TEMPORARY TRAFFIC STRIPE (PAINT)		TEMPORARY PAVEMENT MARKING (PAINT)		REMOVE THERMOPLASTIC TRAFFIC STRIPE	REMOVE YELLOW THERMOPLASTIC TRAFFIC STRIPE (HAZARDOUS WASTE)	REMOVE PAVEMENT MARKER	CHANNELIZER (SURFACE MOUNTED)	TEMPORARY RAILING (TYPE K)	ALTERNATIVE Temp CRASH CUSHION
		DETAIL 21	DETAIL 27B	LIMIT LINE	"STOP" WORD						
		LF	LF	SQFT	SQFT	LF	LF	EA	EA	LF	EA
TH-1	"M" 99+70 TO 114+50	1421	2892			79	1448	124	32		
	"DWY 2" 10+20 TO 10+40	20		19	22		20		23		
TH-2	"M" 114+50 TO 127+26	1274	2536			170	1279	108		200	2
SUBTOTAL		2715	5428	19	22	249	2747	232	55	200	2
TOTAL		8143		41		249	2747	232	55	200	2

TRAFFIC HANDLING PLAN
AND QUANTITIES
STAGE 2
SCALE: 1"=50'

TH-2

APPROVED FOR TRAFFIC HANDLING WORK ONLY

BORDER LAST REVISED 7/2/2010

USERNAME => s148600
DGN FILE => 0112000300md002.dgn

RELATIVE BORDER SCALE
IS IN INCHES

0 1 2 3


UNIT 0306

PROJECT NUMBER & PHASE

01120003001

Exhibit 4 Page 35 of 46

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

03-DESIGN

FUNCTIONAL SUPERVISOR

JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY

CHECKED BY

SVETLA MITOVA

JON R. MCKEAN

REVISOR

DATE

REVISOR

DATE

REVISOR

DATE

REVISOR

DATE

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE

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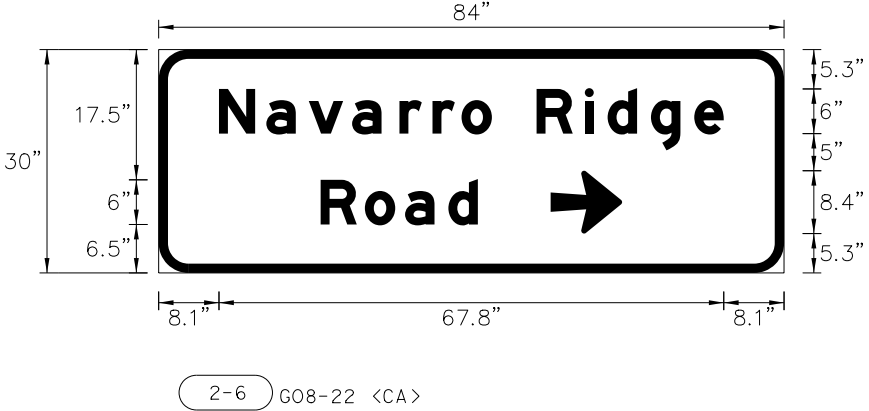
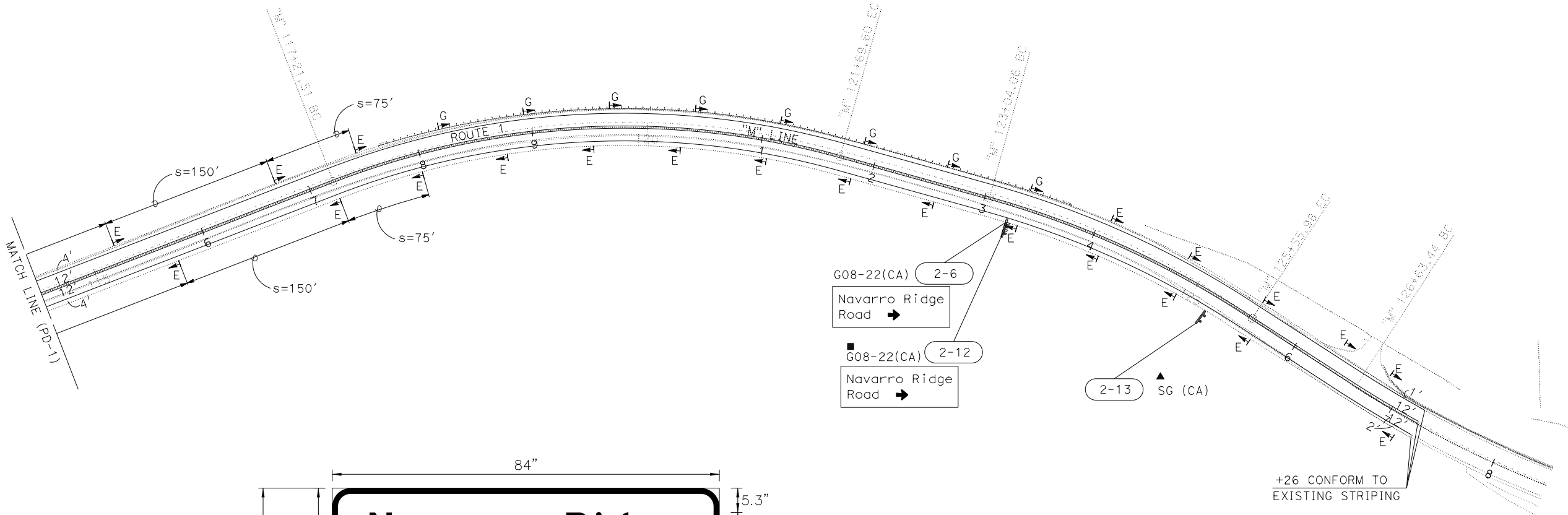
JON R. MCKEAN

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Exp. 06-30-23

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STATE OF CALIFORNIA




PAVEMENT DELINEATION
AND SIGN PLAN

SCALE: 1" = 50'

PD-2

APPROVED FOR PAVEMENT DELINEATION AND SIGN WORK ONLY

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION



03-DESIGN

FUNCTIONAL SUPERVISOR

JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY

CHECKED BY

SVETLA MITOVA

JON R. MCKEAN

REVISED BY

DATE REVISED

NOTE:

THE COLOR OF THE MARKER BODY MUST BE THE SAME AS THE TRAFFIC LINE PLACED.

PAVEMENT DELINEATION QUANTITIES

LOCATION	PAVEMENT MARKER (RETROREFLECTIVE)	6" THERMOPLASTIC TRAFFIC STRIPE (ENHANCED WET NIGHT VISIBILITY)			THERMOPLASTIC PAVEMENT MARKING (ENHANCED WET NIGHT VISIBILITY)		6" THERMOPLASTIC TRAFFIC STRIPE (EWNV) (BROKEN 12-3)	DELINEATOR (CLASS 1)		GUARD RAILING DELINEATOR	12" RUMBLE STRIP (ASPHALT CONCRETE PAVEMENT)	DESCRIPTION/COMMENT
	TYPE D	DETAIL 21	DETAIL 22	DETAIL 27B	STOP	LIMIT LINE	DETAIL 27C	TYPE E	TYPE F			
		EA	LF	LF	LF	SQFT	SQFT	LF	EA			
"M" 99+70 TO 127+25.98				2759	22	27		52	6	17	27.4	LIMIT LINE LENGTH 27 FT
"DWY 2" 10+19 TO 10+35		32										
"M" 99+80 TO 103+70.70	34		782	385								
"M" 104+32.00 TO 127+25.98	194		4578									
"M" 104+45.00 TO 127+25.98				2289								
"M" 103+70 TO 104+45							74					
SUBTOTAL	228	32	5360	5433	22	27	74	52	6	17	27.4	
TOTAL	228	10,825			49		74	58		17	27.4	

PAVEMENT DELINEATION QUANTITIES

PDQ-1

0120003001

07-21-21

DATE PLOTTED => 12-OCT-2021

TIME PLOTTED => 17:06

01120003001

07-21-21

DATE PLOTTED => 12-OCT-2021

TIME PLOTTED => 17:06

BORDER LAST REVISED 7/2/2010

USERNAME => s148600
DGN FILE => 0112000300nc001.dgn

RELATIVE BORDER SCALE
IS IN INCHES

01

02

03

UNIT 0306

PROJECT NUMBER & PHASE

01120003001

07-21-21

DATE PLOTTED => 12-OCT-2021

TIME PLOTTED => 17:06

Exhibit 4 Page 37 of 46

x


x

x

x

x

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

03-DESIGN

FUNCTIONAL SUPERVISOR
JAMES D. RASMUSSEN

CALCULATED-DESIGNED BY
CHECKED BY

SVETLA MITOVA
JON R. MCKEAN

REVISED BY
DATE REVISED

NOTES:

1. EXACT LOCATION AND POSITION OF ROADSIDE SIGNS TO BE DETERMINED BY THE ENGINEER.
2. POST LENGTHS GIVEN ARE APPROXIMATE.
3. "C" DIM = VERTICAL CLEARANCE FROM EP TO BOTTOM OF SIGN PANEL.
4. ALL SIGN DESIGNATIONS SHOWN ARE FEDERAL UNLESS OTHERWISE INDICATED AS A CALIFORNIA <CA> SIGN DESIGNATION.

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

REGISTERED CIVIL ENGINEER

DATE

PLANS APPROVAL DATE

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REGISTERED PROFESSIONAL ENGINEER

JON R. MCKEAN

No. C 61308

Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA

ROADSIDE SIGN QUANTITIES

SIGN NUMBER (SHT-No.)	SIGN DESIGNATION	PANEL SIZE	"C" DIM IN FEET	POST SIZE AND LENGTH		ROADSIDE SIGN		RESET ROADSIDE SIGN (TWO POST)	REMOVE ROADSIDE SIGN	TREATED WOOD WASTE
		INCHES		4"x4"	4"x6"	ONE POST	TWO POST			
						EA	EA	EA	EA	LB
1-1	SG 28(L+) (CA) SG (CA)	30 x 30 30 x 12	4		15'	1				
1-2	R1-1	30 x 30	5	13'		1				
1-3	W1-3 W13-1(30)	36 x 36 30 x 30	4		14'	1				
1-4	SG 28(R+) (CA) SG (CA)	30 x 30 30 x 12	4		15'	1				
1-5	SW 48(30) (CA) SW 48-2(2) (CA)	48 x 36 48 x 12	4		15.5'	1				
2-6	G08-22(CA)	84 X 30	5		14'		1			
1-7	SG 28(L+) (CA) SG (CA)								1	86
1-8	R1-1								1	50
1-9	W1-3 W13-1(30)								1	80
1-10	SG 28(R+) (CA) SG (CA)								1	86
1-11	SW 48(30) (CA) SW 48-2(2) (CA)								1	89
2-12	G08-22(CA)								1	160
2-13	SG (CA)							1		
TOTAL						5	1	1	6	551

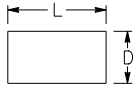
SIGN QUANTITIES

SQ-1

NOTES:

1. ALL SIGN DESIGNATIONS SHOWN ARE FEDERAL UNLESS OTHERWISE INDICATED AS A CALIFORNIA (CA) SIGN DESIGNATION.
2. ALL BLACK SIGN PANEL LEGEND SHEETING MUST BE NON-REFLECTIVE.

LEGEND:



L = LENGTH OF PANEL
D = DEPTH OF PANEL

ROADSIDE SIGN PANEL QUANTITIES

SIGN DESIGNATION	SIGN MESSAGE/DESCRIPTION	PANEL SIZE L x D	PANEL AREA	NUMBER OF PANELS	BACKGROUND		LEGEND		PROTECTIVE-OVERLAY FILM (PREMIUM)	FURNISH SINGLE SHEET ALUMINUM SIGN		
					SHEETING COLOR	RETROREFLECTIVE ASTM TYPE	SHEETING COLOR	RETROREFLECTIVE ASTM TYPE		UNFRAMED		FRAMED
		0.063"	0.080"							0.080"		
		SQFT	SQFT							SQFT		
R1-1	STOP	30	5.18	1	RED	XI	WHITE	XI	X	5.18		
W1-3	REVERSE TURN RT	36 X 36	9.00	1	YELLOW	XI	BLACK		X	9.00		
							YELLOW	XI				
W13-1(30)	ADVISORY SPEED	30 X 30	6.25	1	YELLOW	XI	BLACK		X	6.25		
							YELLOW	XI				
SW48(30) (CA)	TRACTOR-SEMI'S OVER 30 FEET KINGPIN TO REAR AXLE NOT ADVISED	48 X 36	12.00	1	YELLOW	XI	BLACK		X		12.00	
							YELLOW	XI				
SW48-2(2) (CA)	NEXT 2 MILES	48 X 12	4.00	1	YELLOW	XI	BLACK		X		4.00	
							YELLOW	XI				
SG 28(R+) (CA)	COASTAL VIEW	30 X 30	6.25	1	BROWN	XI	WHITE	XI	X	6.25		
							BROWN	XI				
SG (CA)	NO RVs	30 X 12	2.50	2	BROWN	XI	WHITE	XI	X	5.00		
							BROWN	XI				
SG 28(L+) (CA)	COASTAL VIEW	30 X 30	6.25	1	BROWN	XI	WHITE	XI	X	6.25		
							BROWN	XI				
G08-22(CA)	NAVARO RIDGE ROAD →	84 X 30	17.50	1	GREEN	XI	WHITE	XI	X			17.50
							GREEN	XI				
TOTAL										37.93	16.00	17.50

Dist

COUNTY

ROUTE

POST MILES TOTAL PROJECT

SHEET No.

TOTAL SHEETS

01

Men

1

41.8/42.3

REGISTERED CIVIL ENGINEER

DATE

PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

REGISTERED PROFESSIONAL ENGINEER

JON R. MCKEAN


No. C 61308

Exp. 06-30-23

CIVIL

STATE OF CALIFORNIA

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION



FUNCTIONAL SUPERVISOR

TIMOTHY L. BOESE

CALCULATED-DESIGNED BY

CHECKED BY

PHLORA BARBASH

REVISOR

DATE

REVISED BY

DATE

LEGEND:

EROSION CONTROL (TYPE 1)

EROSION CONTROL (TYPE 2)

FR

FIBER ROLLS

CS

COMPOST SOCK

ABBREVIATIONS:

FRM

FIBER REINFORCED MATRIX

HBGM

HYDRAULIC BIOTIC GROWTH MEDIUM

Dist

COUNTY

ROUTE

POST MILES
TOTAL PROJECT

SHEET
No.

TOTAL
SHEETS

01

Men

1

41.8/42.3

LICENSED LANDSCAPE ARCHITECT

Signature

PLANS APPROVAL DATE

Renewal Date

Date

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

EROSION CONTROL (TYPE 1)

SEQUENCE	ITEM	MATERIAL		APPLICATION RATE
		DESCRIPTION	TYPE	
STEP 1	HYDRAULIC BIOTIC GROWTH MEDIUM	SEED	SEED MIX	45 LB/AC
		HBGM		3000 LB/ACRE
STEP 2	FIBER REINFORCED MATRIX	FRM		3000 LB/ACRE

EROSION CONTROL (TYPE 2)

SEQUENCE	ITEM	MATERIAL			APPLICATION RATE
		DESCRIPTION	TYPE	FASTENER	
STEP 1	RECP (NETTING)	COIR NETTING	A	12", 11-GAUGE STEEL STAPLE	
STEP 2	HYDRAULIC BIOTIC GROWTH MEDIUM	SEED	SEED MIX		45 LB/AC
		HBGM			3000 LB/ACRE
STEP 3	FIBER REINFORCED MATRIX	FRM			3000 LB/ACRE

FIBER ROLLS

SEQUENCE	ITEM	MATERIAL		REMARKS
		DESCRIPTION	TYPE	
INSTALL BEFORE HYDRAULIC APPLICATIONS	FIBER ROLLS	FIBER ROLL	8" TO 10" Dia	TYPE 1 INSTALLATION

COMPOST SOCK

SEQUENCE	ITEM	MATERIAL		REMARKS
		DESCRIPTION	TYPE	
INSTALL BEFORE HYDRAULIC APPLICATIONS	COMPOST SOCK	COMPOST FILLED BIODEGRADABLE TUBE	12" Dia	SEE DETAIL

SEED MIX

BOTANICAL NAME (COMMON NAME)	PERCENT GERMINATION (MINIMUM)	POUNDS PURE LIVE SEED PER ACRE (SLOPE MEASUREMENT)
ACHILLEA MILLEFOLIUM (COMMON YARROW)	55	0.5
ACMISPON AMERICANUS (SPANISH CLOVER)	55	3.0
ARTEMISIA DOUGLASIANA (CALIFORNIA MUGWORT)	20	1.0
BACCHARIS PILULARIS (COYOTE BRUSH)	20	1.0
BROMUS CARINATUS (CALIFORNIA BROME)	75	17.0
DANTHONIA CALIFORNICA (CALIFORNIA OATGRASS)	60	11.0
ERIOPHYLLUM STAECHADIFOLIUM (SEASIDE WOOLLY SUNFLOWER)	25	2.0
FESTUCA MICROSTACHYS (SMALL FESCUE)	50	4.0
FESTUCA RUBRA (RED FESCUE)	55	5.0
MIMULUS AURANTIACUS (STICKY MONKEY FLOWER)	30	0.5

EROSION CONTROL LEGEND

ECL-1

BORDER LAST REVISED 7/2/2010

USERNAME => s148600
DGN FILE => 0112000300+c001.dgn

RELATIVE BORDER SCALE IS IN INCHES

01

02

03

04

05

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95

96

97

98

99

100

UNIT 0314

PROJECT NUMBER & PHASE

01120003001

DATE PLOTTED => 14-OCT-2021

TIME PLOTTED => 13:54

Exhibit 4 Page 42 of 46

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

LANDSCAPE ARCHITECTURE

FUNCTIONAL SUPERVISOR

TIMOTHY L. BOESE

CALCULATED-DESIGNED BY

CHECKED BY

PHLORA BARBASH

REVISED BY

DATE REVISED

NOTE:
FOR ACCURATE RIGHT OF WAY DATA, CONTACT
RIGHT OF WAY ENGINEERING AT THE DISTRICT OFFICE.

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		

LICENSED LANDSCAPE ARCHITECT

PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS
OR AGENTS SHALL NOT BE RESPONSIBLE FOR
THE ACCURACY OR COMPLETENESS OF SCANNED
COPIES OF THIS PLAN SHEET.

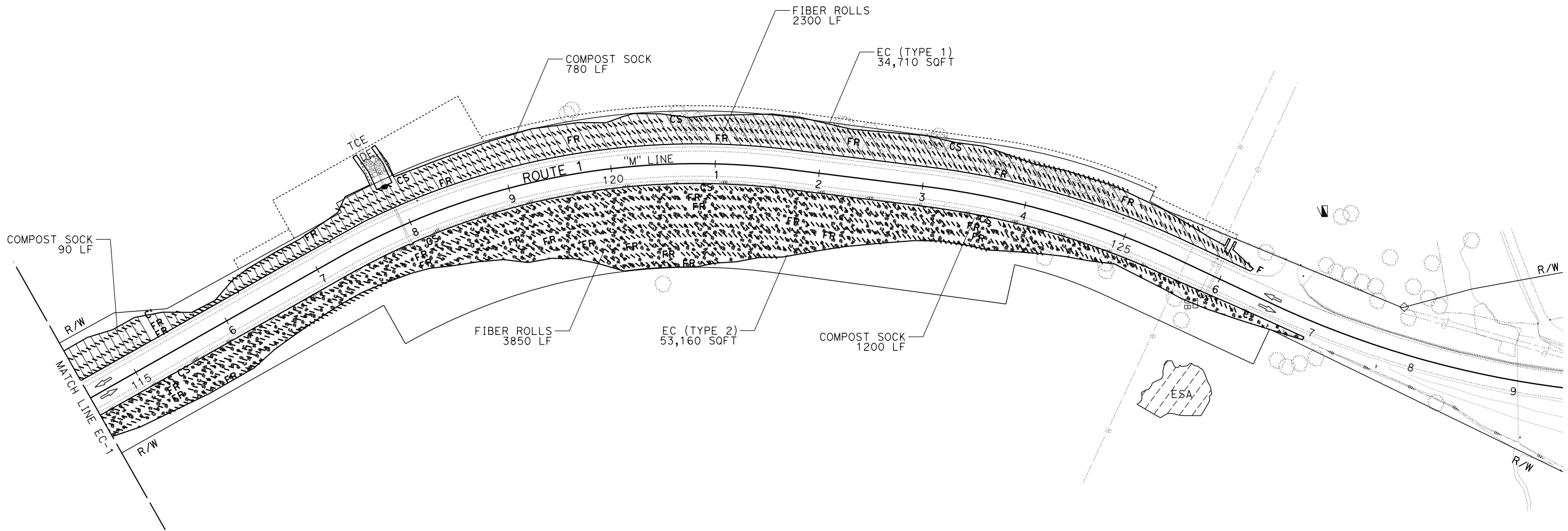
LICENSED LANDSCAPE ARCHITECT

Signature

Renewal Date

Date

STATE OF CALIFORNIA



EROSION CONTROL PLAN
EC-2

SCALE: 1" = 50'

APPROVED FOR EROSION CONTROL WORK ONLY

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STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

FUNCTIONAL SUPERVISOR

PHLORA BARBASH

REVISOR

DATE

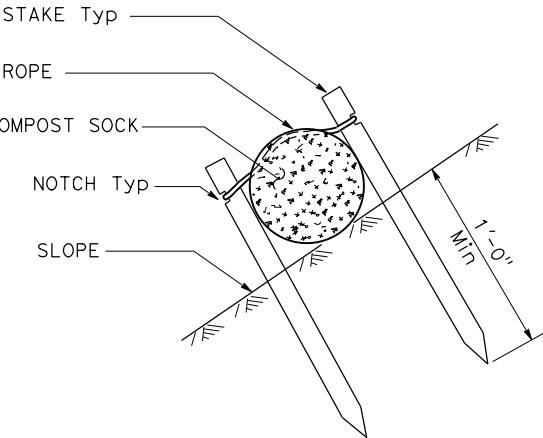
LANDSCAPE ARCHITECTURE

TIMOTHY L. BOESE

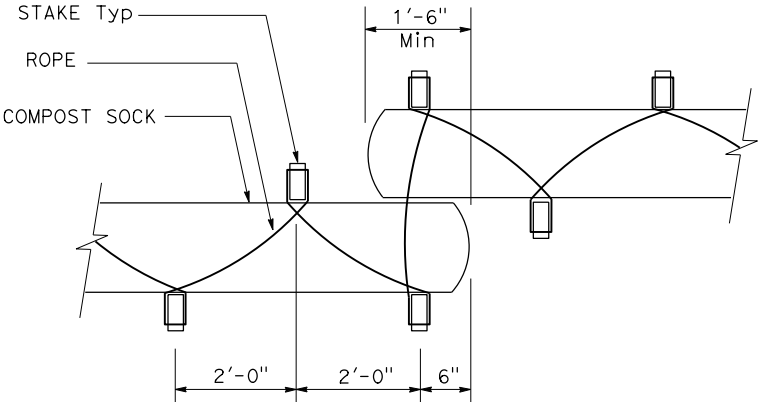
CHECKED BY

REVISOR

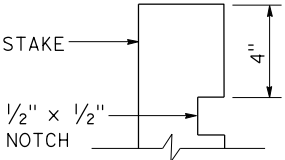
DATE



SECTION



PLAN



ELEVATION

COMPOST SOCK DETAIL

STAKE NOTCH DETAIL

EROSION CONTROL DETAILS

NO SCALE

ECD-1

APPROVED FOR EROSION CONTROL WORK ONLY

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		
LICENSED LANDSCAPE ARCHITECT			<div><div>LICENSED LANDSCAPE ARCHITECT</div><div>Signature</div><div>Renewal Date</div><div>Date</div><div>STATE OF CALIFORNIA</div></div>		
PLANS APPROVAL DATE					
THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.					

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x

x

x

x

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION	LANDSCAPE ARCHITECTURE	FUNCTIONAL SUPERVISOR TIMOTHY L. BOESE	CALCULATED- DESIGNED BY CHECKED BY	PHLORA BARBASH	REVISED BY DATE REVISED		



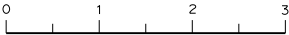
EROSION CONTROL QUANTITIES

EC SHEET	LINE	DIRECTION	DESCRIPTION	FIBER REINFORCED MATRIX	HYDRAULIC BIOTIC GROWTH MEDIUM	FIBER ROLLS	COMPOST SOCK	ROLLED EROSION CONTROL PRODUCT (NETTING)
				SQFT	SQFT	LF	LF	SQFT
1	M	LT	EC (TYPE 1)	23,730	23,730			
	M	LT	FIBER ROLLS			1950		
	M	LT	COMPOST SOCK				580	
	M	RT	EC (TYPE 2)	25,940	25,940			25,940
	M	RT	EC (TYPE 1)	110	110			
	M	RT	FIBER ROLLS			850		
2	M	RT	COMPOST SOCK				1250	
	M	LT	EC (TYPE 1)	34,710	34,710			
	M	LT	FIBER ROLLS			2300		
	M	LT	COMPOST SOCK				870	
	M	RT	EC (TYPE 2)	53,160	53,160			53,160
	M	RT	FIBER ROLLS			3850		
	M	RT	COMPOST SOCK				1200	
SUBTOTAL FROM SHEET C-3								4455
TOTAL				137,650	137,650	8950	3900	83,555

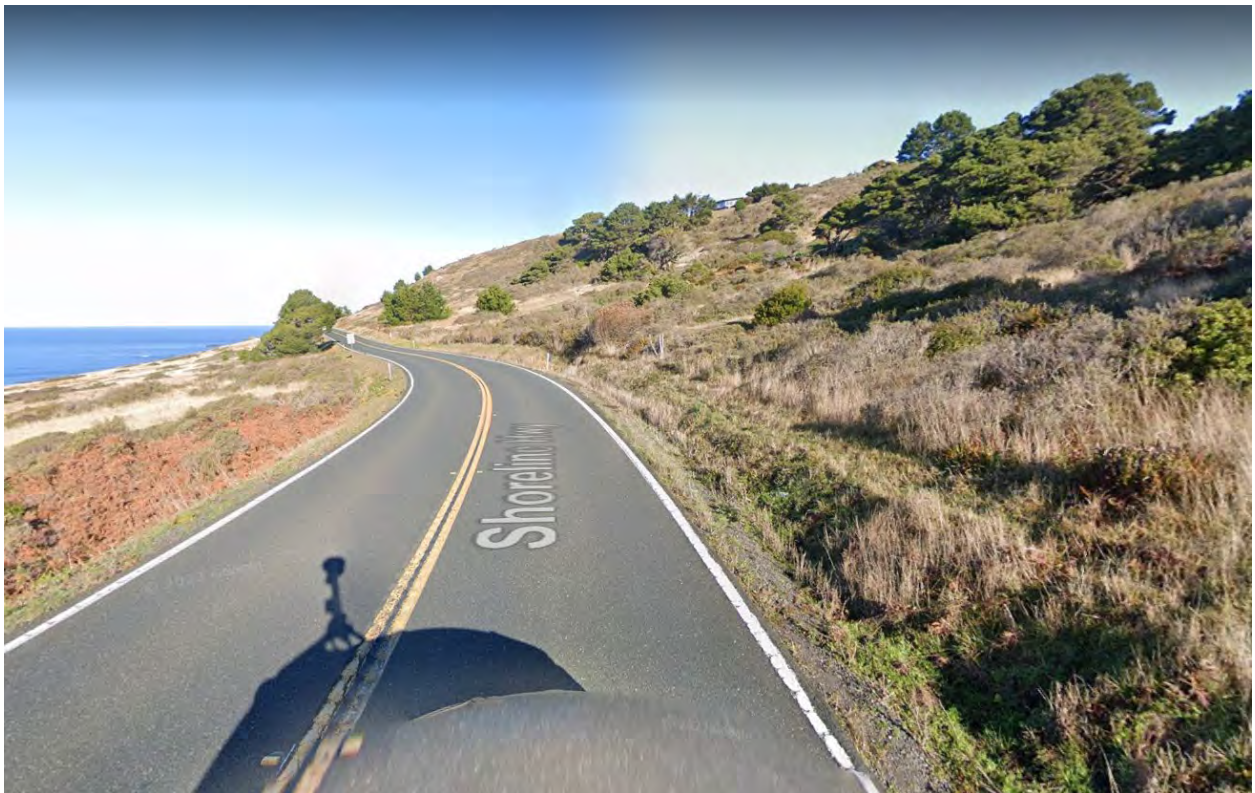
MOVE-IN/MOVE-OUT (EROSION CONTROL)
EA
2

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
01	Men	1	41.8/42.3		
LICENSED LANDSCAPE ARCHITECT			<div>LICENSED LANDSCAPE ARCHITECT Signature Renewal Date Date STATE OF CALIFORNIA</div>		
PLANS APPROVAL DATE					
THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.					

EROSION CONTROL QUANTITIES
ECQ-1









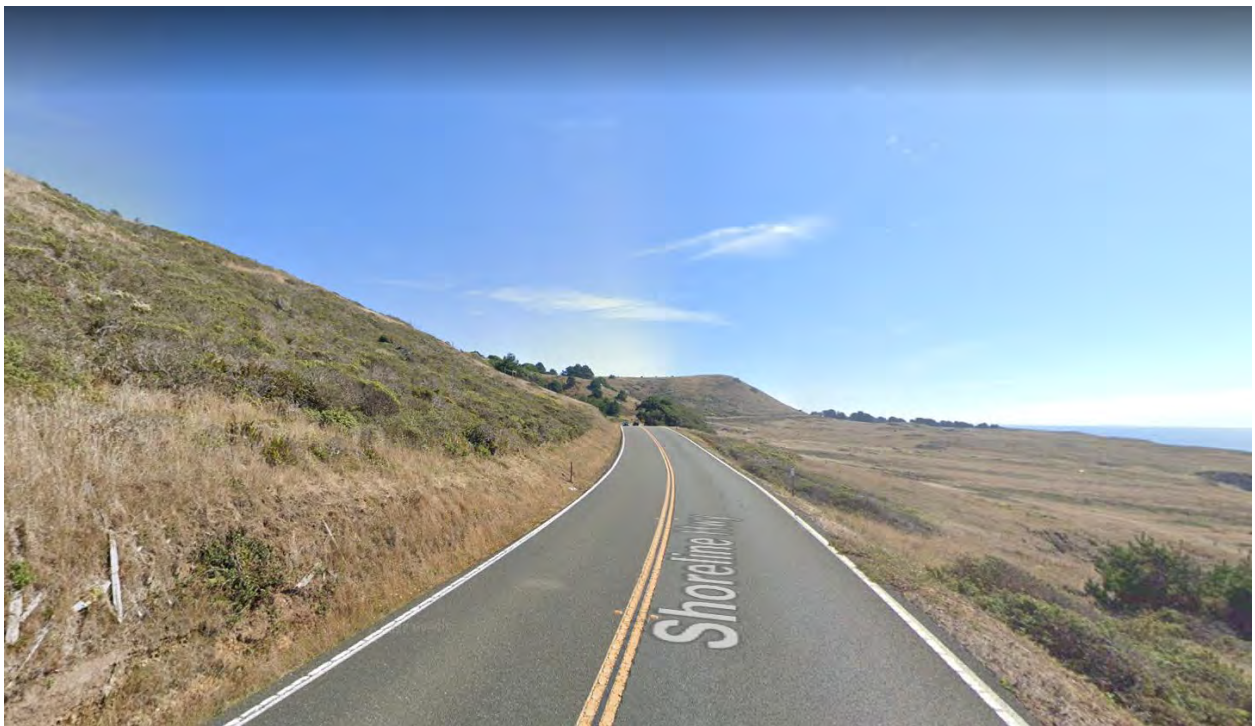






Figure 6
View be-
fore MGS
installation
at PM
41.79.



Figure 7
After MGS
installation
without
staining.



Figure 8
After MGS
Installation
without
staining.



Figure 9

View before
MGS installation at PM
42.30



Figure 10

After MGS installation
without staining.



Figure 11

After MGS Installation
without staining.



Figure 12 Tree removal locations.



Figure 13 View looking southbound of trees to be removed adjacent to the roadway.



Figure 14 View looking northbound of trees to be removed adjacent to the roadway.



Figure 15 View looking southbound of trees to be removed adjacent to the roadway.



Figure 16 View looking northbound of trees to be removed adjacent to the roadway.

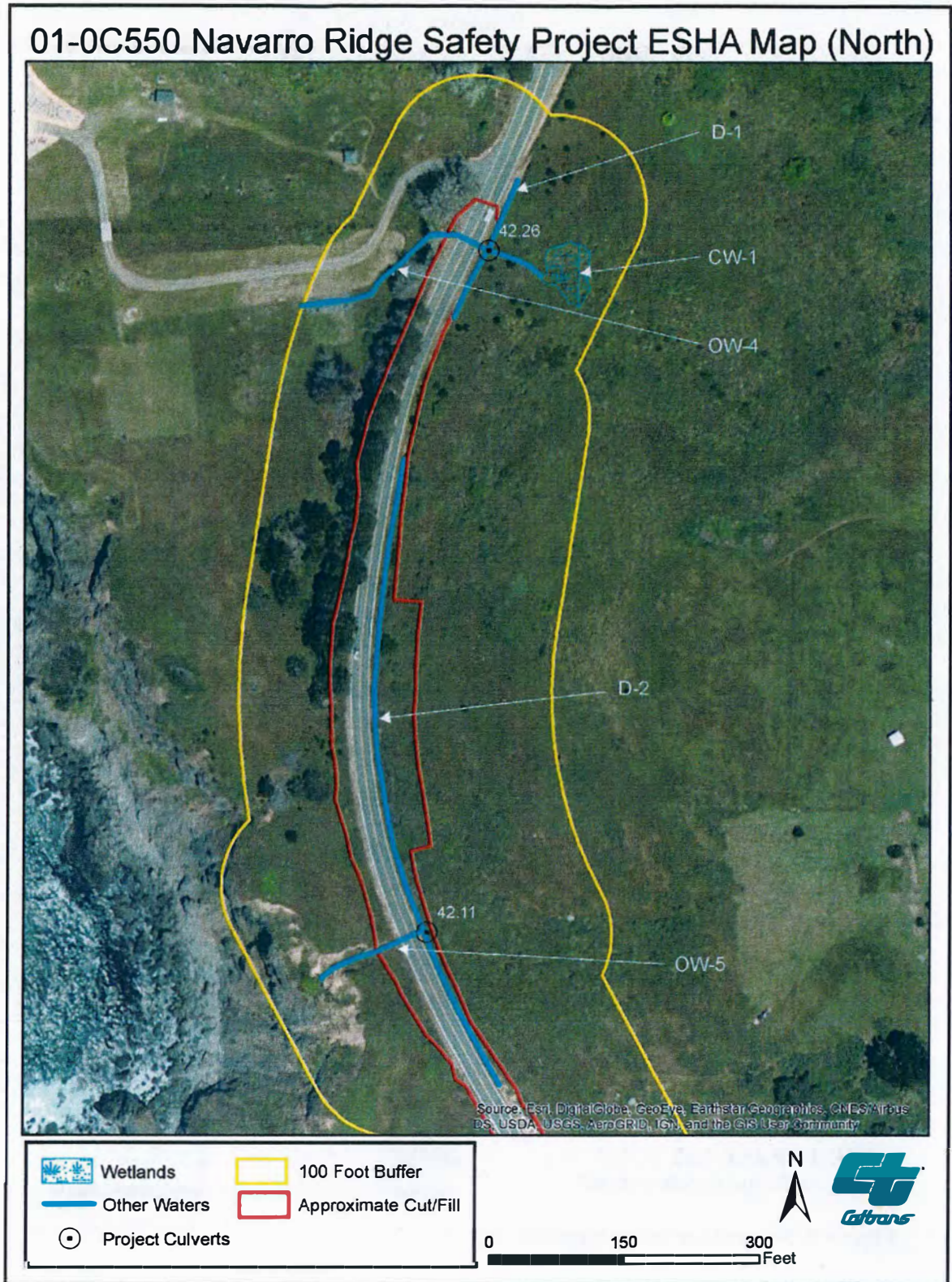


Figure 3. ESHA Map (Northern Extent)



Figure 4. ESHA Map (Middle Extent)

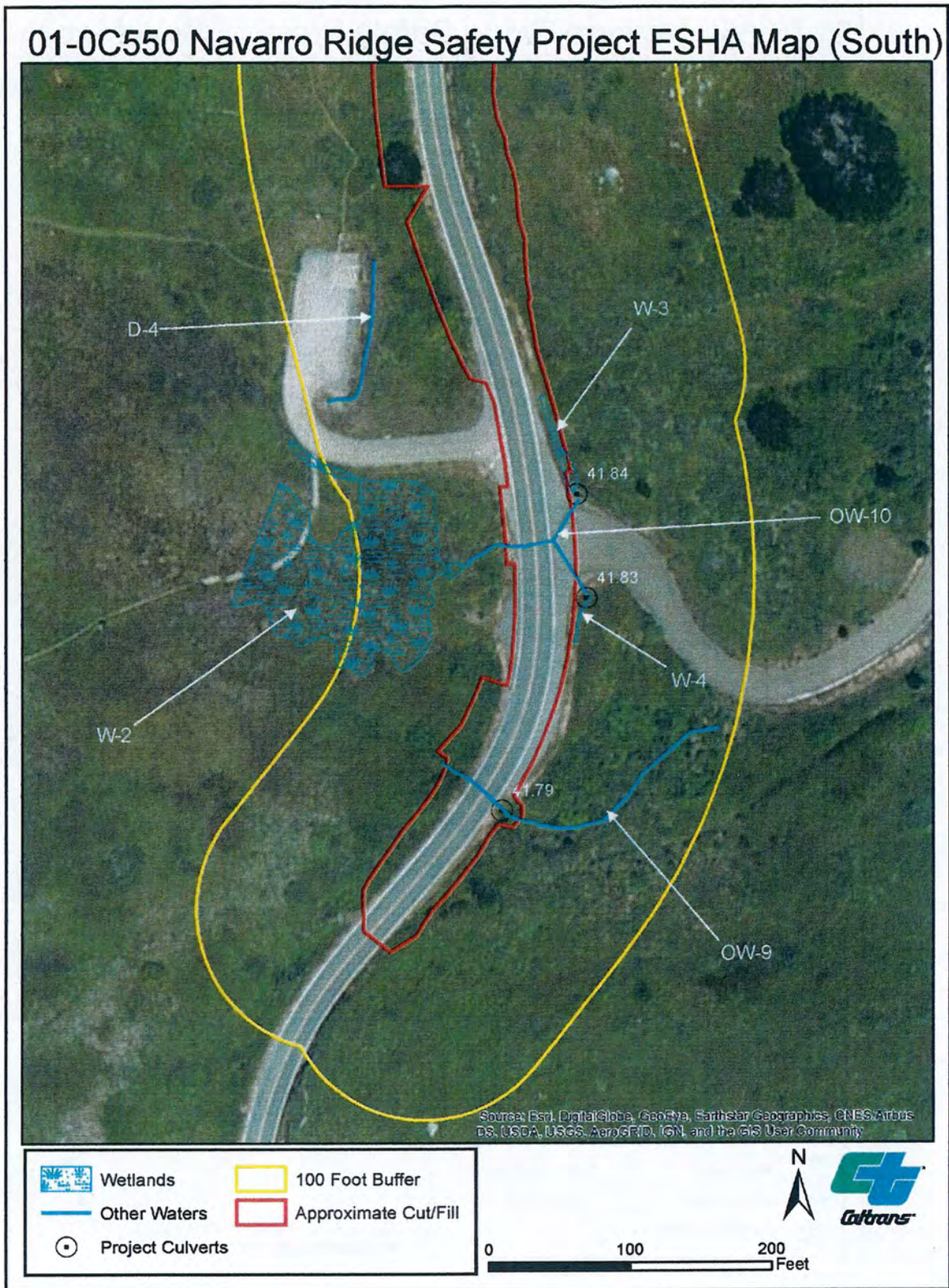


Figure 5. ESHA Map (Southern Extent)

01-0C550 ESHA Map (Staging Area)

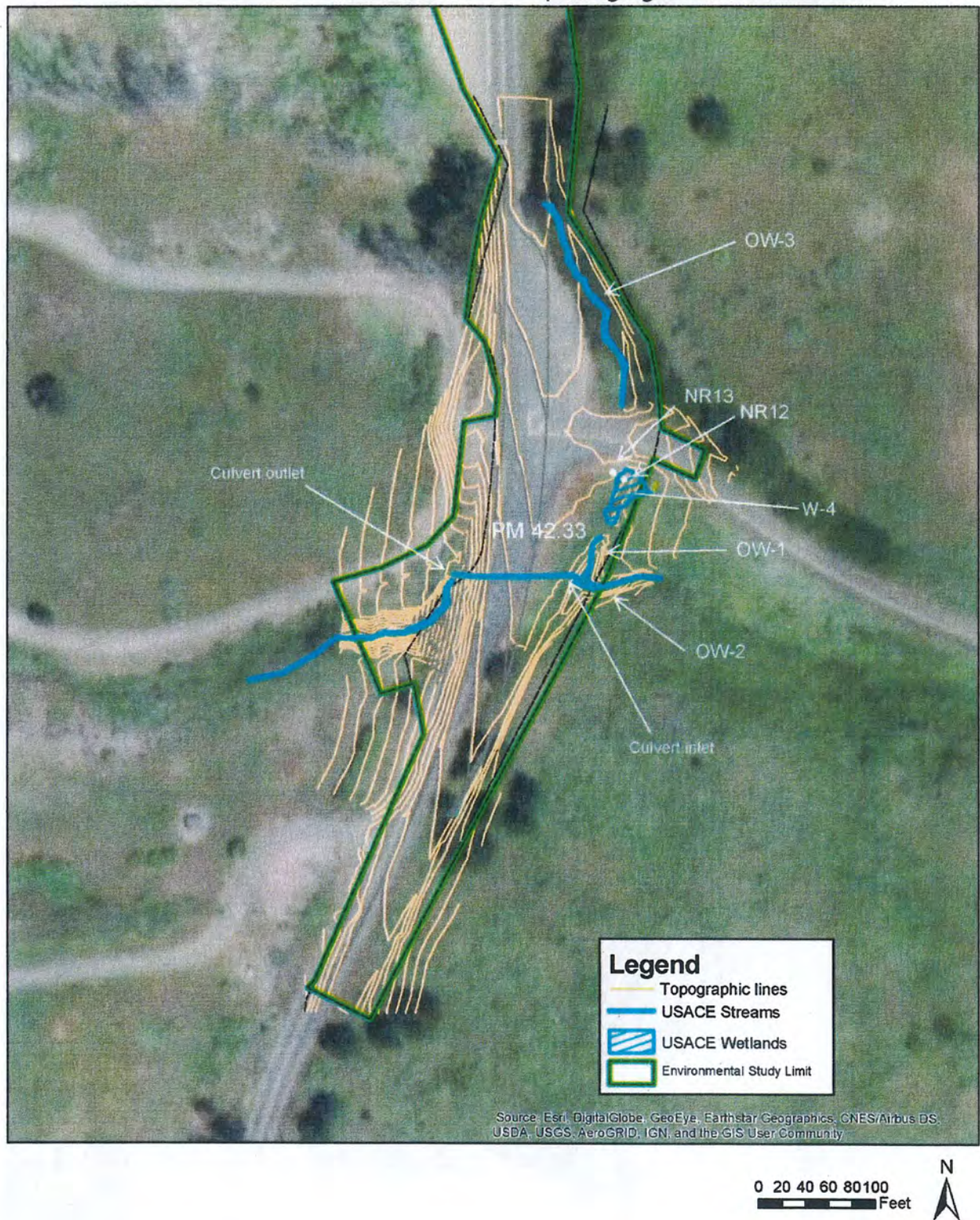


Figure 6. ESHA Map (Staging Area)



COUNTY OF MENDOCINO

DEPARTMENT OF PLANNING AND BUILDING SERVICES

860 NORTH BUSH STREET • UKIAH • CALIFORNIA • 95482

120 WEST FIR STREET • FORT BRAGG • CALIFORNIA • 95437

JULIA KROG, DIRECTOR

PHONE: 707-234-6650

FAX: 707-463-5709

FB PHONE: 707-964-5379

FB FAX: 707-961-2427

pbs@mendocinocounty.org

www.mendocinocounty.org/pbs

April 6, 2022

NOTICE OF FINAL ACTION

Action has been completed by the County of Mendocino on the below described project located within the Coastal Zone.

CASE#: CDP_2019-0024

DATE FILED: 7/1/2019

OWNER/APPLICANT: CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

AGENT: FRANK DEMLING

REQUEST: Standard Coastal Development Permit to make safety improvements and perform rehabilitation on State Route (SR) 1 from post mile (PM) 41.78 to PM 42.3. The project proposes to widen the existing lanes to 12 feet each, widen the existing shoulders in both directions to 4 feet, install a Midwest Guardrail System (MGS) treated with light-brown stain, improve the superelevation, reestablish the drainage facilities and 6-foot box culvert for wildlife passage, replace the centerline rumble strip, and remove up to 75 trees.

ENVIRONMENTAL DETERMINATION: Categorical Exempt

LOCATION: Within the Coastal Zone along SR1 just south of its intersection with Navarro Ridge Road (County Road 518), between post miles 41.78 and 42.3. Staging is proposed at post mile 42.4.

SUPERVISORIAL DISTRICT: 5

STAFF PLANNER: JULIA KROG

ACTION TAKEN: APPROVED WITH CONDITIONS

The Coastal Permit Administrator, on November 17, 2021, approved the above described project. See attached documents for the findings and conditions in support of this decision.

The above project was appealed to the Mendocino County Board of Supervisors on November 29, 2021. On April 5, 2022 the Mendocino County Board of Supervisors held a Noticed Public Hearing to consider the appeal, where they unanimously voted to uphold the Coastal Permit Administrator approval of the project.

This project is appealable to the Coastal Commission pursuant to Public Resources Code, Section 30603. An aggrieved person may appeal this decision to the Coastal Commission within 10 working days following Coastal Commission receipt of this notice. Appeals must be in writing to the appropriate Coastal Commission district office.

Attachments

cc: Coastal Commission
Assessor

Exhibit 8 – Mendocino County Notice of Final Action

Appeal No. A-1-MEN-22-0014 (Caltrans)

Navarro Ridge Safety Project

Page 1 of 1



**COASTAL PERMIT ADMINISTRATOR
STAFF REPORT – STANDARD CDP**

**NOVEMBER 17, 2021
CDP_2019-0024**

SUMMARY

OWNER/APPLICANT: CALIFORNIA DEPARTMENT OF
TRANSPORTATION (CALTRANS), DISTRICT 1
1656 UNION ST.
EUREKA, CA 95501

AGENT: FRANK DEMLING
1656 UNION ST.
EUREKA, CA 95501

REQUEST: Standard Coastal Development Permit to make safety improvements and perform rehabilitation on State Route (SR) 1 from post mile (PM) 41.78 to PM 42.3. The project proposes to widen the existing lanes to 12 feet each, widen the existing shoulders in both directions to 4 feet, install a Midwest Guardrail System (MGS) treated with light-brown stain, improve the superelevation, reestablish the drainage facilities and 6-foot box culvert for wildlife passage, replace the centerline rumble strip, and remove up to 75 trees.

LOCATION: Within the Coastal Zone along SR1 just south of its intersection with Navarro Ridge Road (County Road 518), between postmiles 41.78 and 42.3. Staging is proposed at postmile 42.4.

TOTAL ACREAGE: 4.73 acres (total disturbed area)

GENERAL PLAN: Rural Residential, five acre minimum parcel size with alternate density of one acre (RR5(1)), Remote Residential, forty acre minimum parcel size (RMR40), and right-of-way (ROW)

ZONING: Rural Residential, five acre minimum parcel size with alternate density of one acre (RR5(1)), Remote Residential, forty acre minimum parcel size (RMR40), and right-of-way (ROW)

SUPERVISORIAL DISTRICT: 5 - Williams

ENVIRONMENTAL DETERMINATION: Class 1(D) Categorically Exempt (Caltrans as Lead Agency), Notice of Exemption SCH 2019-038511

APPEALABLE: Yes, highly scenic and west of first public road

RECOMMENDATION: Approve with Conditions

STAFF PLANNER: JULIA KROG and SCOTT PERKINS (SHN)

BACKGROUND

PROJECT DESCRIPTION: Caltrans requests a Standard Coastal Development Permit to make safety improvements and perform rehabilitation on State Route (SR) 1 from post mile (PM) 41.78 to PM 42.3. The project proposes to widen the existing lanes to 12 feet each, widen the existing shoulders in both directions to 4 feet, install a Midwest Guardrail System (MGS) treated with light-brown stain, improve the superelevation, reestablish the drainage facilities and 6-foot box culvert for wildlife passage, replace the centerline rumble strip, and remove up to 75 trees.

The trees are proposed for removal to accommodate road widening. Of the 75 trees proposed for removal, approximately 45 are alive (12 Bishop pines, 32 Monterey pines, and 1 Douglas fir), approximately 15 are dead standing trees (most likely Monterey pines), and approximately 15 are stumps.

Grading activities include extending the “cut bank” on the east side of SR1 to provide adequate space for the road widening. 14,075 cubic yards of material would be removed, and 3,858 cubic yards of the removed material would provide fill for the shoulder extension on the west side of the road. The remaining 10,217 cubic yards of excess material would be hauled off site to an approved disposal site.

Staging areas have been identified on the north end of the project within existing pullouts on the west and east side of SR1 at approximately PM 42.4.

Proposed temporary Best Management Practices (BMPs) to be implemented during construction include silt fencing, fiber rolls, temporary high-visibility fencing (THVF), street sweeping, stabilizing construction entrances and exits, temporary gravel bag berms, and concrete washouts.

The total disturbed area would be 4.73 acres. Impervious areas would be increased from 1.68 acres (existing roadway) to 2.16 acres, representing a net increase of 0.48 acres.

Environmentally Sensitive Habitat Areas would be bounded by THVF to indicate areas that are off-limits to the contractor.

Traffic control measures would keep a minimum of 12 feet of paved roadway open for public traffic. Bicyclists would be accommodated through the work zone. The estimated maximum delay during one-way reversing traffic control would be 10 minutes. Access to side roads (including access to Navarro Point Preserve parking lot) and to residences would be maintained at all times.

The proposed widening requires the existing drainage inlets be removed and the existing 18-inch culverts to be replaced with 24-inch culverts and extended beyond the width of the new roadway. All proposed culverts and down-drains were evaluated by the *Caltrans Final Drainage Report* to confirm that they have the necessary capacity to handle runoff from 10-year and 100-year storm events. The table below provides more specific detail about the drainage improvements proposed for the project.

MILE	EXISTING FACILITY	PROPOSED ACTIVITY
41.79	8' x 6' x 35.6' box culvert	<ul style="list-style-type: none">• Extend culvert 10.5' west and 5.5' east• Install cable railing• Replace wingwalls on west side
41.83	Two 12" plastic pipes	<ul style="list-style-type: none">• Replace existing DIs• Place RSP with RSP fabric at outlet
41.84	18" culvert with "Y" slot drain across eastside driveway	<ul style="list-style-type: none">• Replace slot drain with two DIs• Install 24" culvert across driveway• Install 24" x 79.1' APC across SR1• Place RSP with RSP fabric at outlet
41.95	18" x 36.7' reinforced concrete pipe	<ul style="list-style-type: none">• Replace with 24" x 52.4' APC• Install DI• Install 24" AFES

41.98	18" x 37.5' reinforced concrete pipe	<ul style="list-style-type: none"> • Replace with 24" x 50.9' APC • Install DI • Install 24" AFES
42.02	24" x 32.1' corrugated metal pipe	<ul style="list-style-type: none"> • Replace with 24" x 43.7' APC • Install DI • Install 24" AFES
42.11	18" x 34' and 18" x 33.4' down-drain	<ul style="list-style-type: none"> • Replace with 24" x 66.4' APC and 15' down-drain • Remove headwall • Install DI • Line gully with RSP
42.26	18" x 38.4' corrugated metal pipe	<ul style="list-style-type: none"> • Replace with 24" x 45.2' APC • Replace DI • Install 24" AFES • Place RSP

Table Abbreviations

APC: alternative pipe culvert

AFES: alternative flared end section

DI: drainage inlet

RSP: rock slope protection

APPLICANT'S STATEMENT: Please find the complete Applicant's Statement attached (*Applicant's Statement*).

RELATED APPLICATIONS: There are no related applications on-site. Caltrans has a pending application for a Coastal Development Permit for drainage improvements to SR1 south of this project's boundary (CDP 2019-0034).

SITE CHARACTERISTICS: The project site is located along SR1 south of Albion and north of the Navarro River (see attached *Location Map*). The project would occur between PM 41.78 and 42.3 (with staging at PM 42.4) within the public right-of-way and within temporary construction easements (see attached *Aerial Imagery* and *Topographic Map*). The zoning district and General Plan classification is Rural Residential to the east of SR1 and Remote Residential to the west of SR1. The project site is entirely within the California Coastal Zone (see attached *LCP Land Use Map 19: Navarro*). Steep slopes predominate the project area, with much of the slopes exceeding 33 degrees (see attached *Slope Map*). "Rare Plants" are indicated as present north of the project scope (see attached *Biological Resources, LCP Habitats & Resources, and Wetlands*). Surrounding properties are within the Albion-Little River Fire Protection District (see attached *Fire Hazard Zones & Responsibility Areas*). Soil type is Western Classification 139 for the northern portion of the project and Western Classification 117 for the southern portion (see attached *Soil Classifications*). Lands surrounding the project are designated "Highly Scenic" and lands west are also within a "Tree Removal Area" (see attached *Highly Scenic and Tree Removal Areas*). Parcels southwest of the project are under Mendocino Land Trust ownership. Other adjacent parcels are owned by numerous different individuals (see *Adjacent Parcels*).

SURROUNDING LAND USE AND ZONING:

	GENERAL PLAN	ZONING	LOT SIZES (± acres)	USES
NORTH	Rural Residential, with Planned Development (RR 5-PD)	Rural Residential, with Planned Development (RR5:PD)	6.00, 15.07	Residential
EAST	Rural Residential, with Planned Development (RR 5-PD)	Rural Residential, with Planned Development (RR5:PD)	15.07, 3.29, 3.30, 6.00	Residential
SOUTH	Rural Residential, with Planned Development (RR 5-PD), Remote Residential (RMR 40)	Rural Residential, with Planned Development (RR5:PD), Remote Residential (RMR 40)	6.02, 38.00	Residential
WEST	Remote Residential (RMR 40)	Remote Residential (RMR 40)	17.29	Residential / Public Access

PUBLIC SERVICES:

ACCESS	State Route 1 (State)
FIRE DISTRICT	Albion Little River Fire Protection District
WATER DISTRICT	None
SEWER DISTRICT	None
SCHOOL DISTRICT	Mendocino Unified School District

AGENCY COMMENTS: On August 2, 2021, project referrals were sent to the following responsible or trustee agencies with jurisdiction over the project. A summary of the submitted agency comments is listed below. Any comment that would trigger a project modification, conditions of approval, or denial are discussed in full as key issues in this report.

REFERRAL AGENCIES	COMMENT
Department of Transportation	No comment
Environmental Health	No response
Building Inspection	No comment
Mendocino Land Trust	No response
Assessor	No response
Agriculture Commissioner	No comment
Air Quality Management District	Comments
Archaeological Commission	Comments
Sonoma State University NWIC	Comments
Resource Lands Protection Comm.	No comment
Native Plant Society	No response
Caltrans	No response
Calfire – Resource Management	No response
Calfire – Land Use	No response
CA Department of Fish and Wildlife	Comments
Coastal Commission	No response
California Highway Patrol	No response
Reg. Water Quality Control Board	No response
Sierra Club	No response
US Fish and Wildlife Service	No response
Cloverdale Rancheria	No response
Redwood Valley Rancheria	No response
Sherwood Valley Band of Pomo	No response
Mendocino Transit Authority	No response
County Addresser	No comment
Albion – Little River Fire District	No response

LOCAL COASTAL PROGRAM CONSISTENCY: The proposed project is consistent with the goals and policies of the Local Coastal Program as detailed below.

Land Use/Zoning: The project falls mostly within the SR1 right-of-way, with limited project elements on adjacent lands under either Rural Residential or Remote Residential General Plan designations and Zoning districts. The subject lands are presently developed with an existing two-lane travel way with appurtenant highway support infrastructure, including drainage facilities. The proposed project would widen the roadway and upgrade the drainage facilities associated with the highway to address existing safety deficiencies described in the Applicant's Statement. The project is consistent with the purpose of the public right-of-way and with the continuance of SR1 as a two-lane roadway.

Habitats and Natural Resources: Caltrans submitted several resource studies evaluating the project's potential to affect habitats and natural resources, potential measures to limit the project's impacts on

these resources, as well as the project's consistency with the Environmentally Sensitive Habitat Area (ESHA) standards in County Code. The following documents supplied the information contained in this analysis:

1. *Navarro Ridge Safety Project Natural Environment Study*, September 2017
2. *Navarro Ridge Safety Project Natural Environment Study Addendum*, November 28, 2018
3. *ESHA Assessment for the Navarro Ridge Safety Project*, June 2019
4. *ESHA Correction Memo*, September 12, 2019
5. *Report of Compliance*, Undated (submitted May 5, 2021)
6. *Onsite Revegetation Plan*, October 2021
7. *Rare Plant Memo/Letter*, October 25, 2021

Studies were conducted within the project area and within a 100-foot buffer around the project. The following ESHAs were identified (see also attached *ESHA Maps*):

ESHA 1 (CW-1) PM 42.26

- Description of ESHA: ESHA 1 (CW-1) is a 0.05-acre (2,178 SF) coastal wetland that has wetland vegetation. A complete delineation was not completed since it is outside the project footprints.
- Buffer: It is anticipated that construction activities would occur approximately 60-70 feet downslope from this wetland. A 100-foot buffer is not feasible at this location since the existing roadway is within 100 feet of the ESHA. Therefore, a 60-foot (minimum) buffer is requested.
- Description of Activities: The biological resource studies provided with the application conclude that no impact to this ESHA is expected. No work is proposed that would directly impact the ESHA. ESHA is upslope from proposed construction activities, thus construction runoff would not impact the ESHA.

ESHA 2 (CW-2) PM 41.98

- Description of ESHA: ESHA 2 (CW-2) is located east and upslope of construction activities adjacent to PM 41.98 (approx.).
- Buffer: It is anticipated that construction activities would occur approximately 100 feet downslope from this wetland. No buffer reduction is requested.
- Description of Activities: The biological resource studies provided with the application conclude that no impact to this ESHA is expected. No work is proposed that would directly impact the ESHA. ESHA is upslope from the proposed construction activities, thus construction runoff would not impact the ESHA.

ESHA 3 (W-1) PM 42.33

- Description of ESHA: ESHA 3 (W-1) is a 0.03-acre (1,307 SF) wetland that has all three wetland parameters. This plant community is dominated by small-fruited bulrush (*Scirpus microcarpus*) with co-dominant species such as Pacific water parsley (*Oenanthe sarmentosa*), giant horsetail (*Equisetum telmateia*), common velvet grass (*Holcus lanatus*) and sedge (*Carex* spp.).
- Buffer: This ESHA is approximately 20-50 feet off the roadway between the staging area and the construction area. A 100-foot buffer is not feasible at this location since the existing roadway is adjacent to the ESHA. Therefore, a 20-foot (minimum) buffer is requested for this ESHA.
- Description of Activities: The biological resource studies provided with the application conclude that no impact to this ESHA is expected. Analysis of this ESHA is

included due to its proximity to the staging area. No work is proposed that would directly or indirectly impact this ESHA.

ESHA 4 (W-2)

- Description of ESHA: ESHA 4 (W-2) is a 0.317-acre (13,810 SF) 3-parameter wetland that is dominated by *Holcus lanatus* and *Equisetum telmateia*.
- Buffer: It is anticipated that construction activities would occur approximately 30 feet upslope from this wetland. A 100-foot buffer is not feasible at this location since the existing roadway is within 100 feet of the ESHA. Therefore, a 30-foot buffer is requested for this ESHA.
- Description of Activities: The biological resource studies provided with the application conclude that no impact to this ESHA is expected with implementation of avoidance measures proposed in the *ESHA Assessment*. These measures include placement of high visibility fencing (HVF) by the contractor along the boundaries of ESHAs adjacent to the project footprint.

ESHA 5 (OW-A)

- Description of ESHA: ESHA 5 (OW-A) is a 0.008-acre (349 SF) drainage that is dominated by *Isotepis cernua*. The existence of this drainage is due to the drainage patterns of the roadway and the private road to the east. In the original *ESHA Assessment*, this ESHA was classified as a wetland and is illustrated on Figure 5 of the *ESHA Assessment* as "W-3." The *ESHA Correction Memo* reclassifies this ESHA as "other waters of the U.S." Caltrans biologists determined that this ESHA is not a jurisdictional wetland due to the fact that the ditches convey roadside runoff from SR1 and from the proposed development.
- Buffer: A buffer is not feasible at this location since the existing roadway is adjacent to the ESHA. Development would occur within this ESHA.
- Description of Activities: Removal and replacement may be necessary. Ditch soil would be removed and set aside until it could be replaced, as described in Caltrans Standard Special Provision (SSP) 19-2.03D(2). Thus, the impacts to the ditch are expected to be temporary. Temporary impacts of 0.0017 acres (75 SF) would be associated with removal and replacement of the drainage ditch.

ESHA 6 (OW-B)

- Description of ESHA: ESHA 6 (OW-B) is a 0.002-acre (88 SF) drainage southeast of the staging area. It is dominated by *Diplacus aurantiacus* and *Cyperus eragrostis*. The existence of this drainage ditch is due to the drainage patterns of the roadway and the private road to the east. In the original *ESHA Assessment*, this ESHA was classified as a wetland and is illustrated on Figure 5 of the *ESHA Assessment* as "W-4." The *ESHA Correction Memo* reclassifies this ESHA as "other waters of the U.S." Caltrans biologists determined that this ESHA is not a jurisdictional wetland due to the fact that the ditches convey roadside runoff from SR1 and from the proposed development.
- Buffer: A buffer is not feasible at this location since the existing roadway is adjacent to the ESHA. Development would occur within this ESHA.
- Description of Activities: Removal and replacement may be necessary. Ditch soil would be removed and set aside until it could be replaced, as described in Caltrans Standard Special Provision (SSP) 19-2.03D(2). Thus, the

impacts to the ditch are expected to be temporary. Temporary impacts of 0.008 acres (349 SF) would be associated with removal and replacement of drainage ditch.

ESHA 7 (D-1, D-2, D-3)

Description of ESHA: ESHA 7 (D-1, D-2, D-3) are roadside ditches that convey stormwater and, possibly, water from upslope and from underground seeps. These three ditches run along the eastern side of the highway and are approximately 1 foot in width. D-1 is the northernmost ditch and runs for approximately 167 feet. D-2 is in the middle of D-1 and D-3 and runs for approximately 728 feet. D-3 is the southernmost ditch and runs for approximately 629 feet.

Buffer: A buffer is not feasible at this location since the existing roadway is adjacent to the ESHA. Development would occur within this ESHA.

Description of Activities: Removal and replacement would be necessary. Soil from the ditches would be removed and set aside until it could be replaced, as described in Caltrans Standard Special Provision (SSP) 19-2.03D(2), in the newly established drainage ditch. Thus, impacts to these ditches would be temporary in nature. Temporary impacts of 0.035 acres (1,525 SF) would be associated with removal and replacement of the drainage ditch.

ESHA 8 (D-4)

Description of ESHA: ESHA 8 (D-4) is a drainage ditch that is in between the roadway and the Navarro Point Preserve parking lot towards the southern end of the project area.

Buffer: It is anticipated that construction activities would occur between approximately 30-feet and 80-feet upslope from this ditch. A 100-foot buffer is not feasible at this location since the existing roadway is within 100 feet of the ESHA. Therefore, a 30-foot (minimum) buffer is requested.

Description of Activities: The biological resource studies provided with this application conclude that no impacts to this ESHA are expected.

ESHA 9 (OW-1)

Description of ESHA: ESHA 9 (OW-1) is a small drainage that drains from the wetland south into Navarro Drainage at the inlet of the culvert. It is approximately 54-feet long by 2-feet wide, making the area about 0.004 acres (174 SF).

Buffer: This ESHA is approximately 20-50 feet off of the roadway between the staging area and the construction area. A 100-foot buffer is not feasible at this location since the existing roadway is less than 100 feet from the ESHA. Therefore, a 20-foot (minimum) buffer is requested.

Description of Activities: The biological resource studies provided with this application conclude that no impacts to this ESHA are expected. Analysis of this ESHA is included due to its proximity to the staging area. No work is proposed that would directly or indirectly impact this ESHA.

ESHA 10 (OW-2)

Description of ESHA: ESHA 10 (OW-2) is the main drainage called "Navarro Drainage" and approximately 642 linear feet occurs within the 100-ft survey area. It is approximately 3 feet wide for a total of 0.044 acres (1,917 SF) of other waters in the survey area. This drainage has a deeply incised channel

and vegetation was observed growing in the existing rock slope protection (RSP) that was placed on the outlet side of the culvert during the 1998 storm damage construction work.

Buffer: This ESHA is adjacent to and runs beneath the roadway between the staging area and the construction area. A 100-foot buffer is not feasible at this location since the existing roadway traverses the ESHA. A reduced buffer of an unspecified distance is requested.

Description of Activities: The biological resources studies provided with this application conclude that no impacts to this ESHA are expected. Analysis of this ESHA is included due to its proximity to the staging area. No work is proposed that would directly or indirectly impact this ESHA.

ESHA 11 (OW-3)

Description of ESHA: ESHA 11 (OW-3) is small drainage that occurs along the east side of a large gravel pullout on the northeast side of the survey area. This area is proposed as an area for contractor use. This drainage totals about 200 feet long by 2 feet wide making it about 0.009 acres (392 SF) of area.

Buffer: This ESHA is adjacent to a potential staging area. A buffer is not feasible at this location since the existing roadway traverses the ESHA. A reduced buffer of an unspecified distance is requested.

Description of Activities: The biological resources studies provided with this application conclude that no impact to this ESHA is expected with implementation of avoidance measures as described in Section 1.3 of the *ESHA Assessment*. These measures include placement high visibility fencing (HVF) by the contractor along the boundaries of ESHAs adjacent to the project footprint and areas for contractor use.

ESHA 12 (OW-4)

Description of ESHA: ESHA 12 (OW-4) is a watercourse associated with the culvert at PM 42.26. The width of the vegetated watercourse is approximately 1 foot. It appears this watercourse facilitates the drainage of CW-1.

Buffer: A buffer is not feasible at this location since the existing roadway traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The 18-inch culvert would be replaced and extended 13 feet to accommodate lane and shoulder widening. Widening would occur approximately 6.5 feet to the east and 6.5 feet to the west. A 11-foot by 4.5-foot RSP energy dissipator would be installed below the culvert outlet. Permanent impacts of approximately 0.001 acres (44 SF) would be associated with the culvert extension and RSP placement. Temporary impacts of 0.002 (88 SF) acres would be associated with construction activities at the inlet.

ESHA 13 (OW-5)

Description of ESHA: ESHA 13 (OW-5) is a watercourse associated with the culvert at PM 42.11. The culvert conveys roadway stormwater runoff and possibly upslope runoff as well. No upslope channels or seeps are evident. On the downslope side, there is a substantial erosional gully present. The erosional channel is approximately 20 feet wide by 50 feet long.

Buffer: A buffer is not feasible at this location since the existing roadway traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The 34-foot 18-inch culvert and 33-foot 18-inch down-drain would be

replaced with a single 65-foot 24-inch culvert. The new culvert outlet would be shifted approximately 8 feet to the east, and the inlet would be shifted approximately 5 feet to the east. The existing drainage inlet and headwall would be removed and a new drainage inlet would be installed. The erosional gully would be filled with quarter-ton RSP to a depth of approximately 5.6-feet. Permanent impacts of 0.017 acres (741 SF) would be associated with RSP placement to address the erosional channel. Temporary impacts of 0.002 acres (88 SF) would be associated with construction activities at the inlet.

ESHA 14 (OW-6)

Description of ESHA: ESHA 14 (OW-6) is a watercourse associated with the culvert at PM 42.02. The culvert conveys roadway stormwater runoff and possibly runoff and/or belowground water originating upslope as well. No upslope or downslope channels or seeps associated with this feature are evident within the 100-foot buffer.

Buffer: A buffer is not feasible at this location since the existing roadway traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The existing 32-foot 24-inch culvert would be removed and replaced with a 41-foot 24-inch culvert. The new inlet would be approximately 7 feet to the east of the existing inlet and the existing outlet would be approximately 2 feet to the west of the existing outlet. The drainage inlet would be removed and replaced. A 14-foot by 6-foot RSP energy dissipator would be installed beneath the outlet. Permanent impacts of approximately 0.002 acres (88 SF) would be associated with the culvert extension and RSP placement. Temporary impacts of 0.002 acres (88 SF) would be associated with construction activities at the inlet.

ESHA 15 (OW-7)

Description of ESHA: ESHA 15 (OW-7) is a watercourse associated with the culvert at PM 41.98. The culvert conveys roadway stormwater runoff and possibly runoff and/or belowground water originating upslope as well. It may drain CW-2, discussed above. No downslope channels or seeps associated with this feature are evident within the 100-foot buffer.

Buffer: A buffer is not feasible at this location since the existing roadway traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The existing 37.5-foot 18-inch culvert would be extended at the inlet and the outlet. The outlet would be extended 5.4 feet with a concrete culvert and concrete collar. The inlet would be extended 9.6-feet with a concrete culvert and concrete collar. The drainage inlet would be removed and replaced. An 11-foot by 4.5-foot RSP energy dissipator would be installed beneath the new outlet. Permanent impacts of approximately 0.0017 acres (75 SF) would be associated with the culvert extension and RSP placement. Temporary impacts of 0.002 acres (88 SF) would be associated with construction activities at the inlet.

ESHA 16 (OW-8)

Description of ESHA: ESHA 16 (OW-8) is a watercourse associated with the culvert at PM 41.95. The culvert conveys roadway stormwater runoff and possibly runoff and/or belowground water originating upslope as well. No upslope or downslope channels or seeps associated with this feature are evident within the 100-foot buffer.

Buffer: A buffer is not feasible at this location since the existing roadway

traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The existing 37.5-foot 18-inch culvert would be extended at the inlet and the outlet. The outlet would be extended 5.1 feet with a concrete culvert and concrete collar. The inlet would be extended 6.6 feet with a concrete culvert and concrete collar. The drainage inlet would be removed and replaced. An 11-foot by 4.5-foot RSP energy dissipator would be installed beneath the new outlet. Permanent impacts of approximately 0.0015 acres (66 SF) would be associated with the culvert extension and RSP placement. Temporary impacts of 0.002 acres (88 SF) would be associated with construction activities at the inlet.

ESHA 17 (OW-9)

Description of ESHA: ESHA 17 (OW-9) is a watercourse associated with the drainage facilities on the adjacent private driveway to the east. These culverts convey both roadway stormwater and runoff originating upslope in the private driveway and the hillside. Water in this watercourse eventually flows through the box culvert at PM 41.79.

Buffer: A buffer is not feasible at this location since the existing roadway traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The existing drainage inlets would be replaced and a 5-foot by 3-foot RSP energy dissipator would be installed at the outlet of the existing culvert. Permanent impacts of approximately 0.0003 acres (13 SF) would be associated with the RSP placement. Temporary impacts of 0.002 acres (88 SF) would be associated with construction activities at the inlet and outlet.

ESHA 18 (OW-10)

Description of ESHA: ESHA 18 (OW-10) is a watercourse that is associated with the culverts at 41.83 and 41.84. These culverts convey both roadway stormwater and runoff originating upslope in the private driveway and the hillside.

Buffer: A buffer is not feasible at this location since the existing roadway traverses the ESHA. Development would occur within this ESHA.

Description of Activities: The existing slotted drains and culvert would be removed. They would be replaced by a new 2-culvert system. Two new drainage inlets would be required. A 14.41-foot by 6-foot RSP energy dissipator would be installed beneath the outlet. Permanent impacts of 0.002 acres (88 SF) would be associated with RSP placement and changes in culvert configuration. Temporary impacts of 0.0002 acres (88 SF) would be associated with construction activities at the inlet.

ESHA 19 (RP-1)

Description of ESHA: ESHA 19 (RP-1) describes Bodega morning glory (rare plant) ESHA located in a small patch at PM 41.75, near the southern project limits.

Buffer: The Bodega morning glory observation nearest the construction activity is within a 100-foot buffer of the edge of the proposed road cut. A 100-foot buffer is not feasible at this location since the existing roadway is less than 100 feet from the ESHA. A reduced buffer of unspecified width is requested.

Description of Activities: No impacts to the species are anticipated as the observation of Bodega morning glory within the 100-foot buffer is outside and upslope of the construction area. The *Rare Plant Memo/Letter* specifies that a qualified biologist shall complete a seasonably appropriate survey to locate the

western extent of the patch, and if the species exists within the 100-foot buffer, THVF would be placed along the edge of the patch to prevent disturbance of the species.

ESHA 20 (RP-2)

Description of ESHA: ESHA 20 (RP-2) describes Harlequin lotus (rare plant) ESHA located in small patches from PM 41.75 through PM 42.1. Harlequin lotus is considered the host plant for the federally listed Lotus blue butterfly.

Buffer: Most Harlequin lotus observations are more than 100 feet from the project; however, an occurrence on the southwest side of the project area may be partially within the 100-foot buffer. A 100-foot buffer is not feasible at this location since the existing roadway is less than 100 feet from the ESHA. A reduced buffer of unspecified width is requested.

Description of Activities: No impacts to the species are anticipated as the observation of Harlequin lotus that may be within the 100-foot buffer is not located where permanent or temporary construction disturbances will occur. The *Rare Plant Memo/Letter* specifies that a qualified biologist shall complete a seasonably appropriate survey to locate the western extent of individual or patches of Harlequin lotus, and if the species exists within the 100-foot buffer, THVF would be placed along the edge of the patch/occurrence to prevent disturbance of the species.

Overall, 20 ESHAs were identified within 100 feet of project activities. Development would occur within 10 of the ESHAs where buffers are infeasible (no development is proposed within wetlands—only “other waters” and drainages), and reduced buffers are requested for 9 ESHAs. The project can maintain a 100-foot buffer from 1 ESHA.

Up to 75 trees are slated for removal, 12 of which are Bishop pines. While Bishop pine forest is considered a vulnerable community, these Bishop pines were not considered ESHA because they are mixed with Monterey pines, were likely planted by landowners for privacy, and are likely invading disturbed coastal prairie habitat. 62 of the trees are located within the right-of-way, and the remaining 13 trees would be removed from within Temporary Construction Easements.

MCC Section 20.496 applies to development proximate to ESHA. Specifically, this code section includes standards for determining the appropriate width of an ESHA buffer when 100 feet cannot be maintained. Additionally, the code includes standards for development that is proposed within ESHA buffers. Caltrans submitted a Reduced Buffer Analysis as part of the *ESHA Assessment*, as amended by the *ESHA Correction Memo* and *ESHA Report of Compliance*.

Buffer Widths: The *ESHA Assessment* specifically addresses the standards in County code for reducing buffers to less than 100 feet. The Reduced Buffer Analysis concludes that although some ESHAs would be directly impacted by construction, “impacts would be avoided through the use of THVF (temporary high visibility fencing) and other avoidance and minimization measures.” These other avoidance and minimization measures are discussed in this report below and are included as approval conditions for the project.

The report goes on to state that the project area “has a low biological value since the waters associated with the impact do not support salmonids or other sensitive species.” Therefore, sensitive species would not be disturbed by the proposed development. Additionally, County code recommends that existing features (such as roads and dikes) shall be used, where feasible, to buffer habitat areas. The proposed project utilizes the existing roadway and existing turnout areas for construction activities and staging, consistent with this standard for determining appropriate buffer width.

Permitted Development within ESHA Buffer: The *ESHA Assessment* also addresses how the proposed project is consistent with County code requirements for development permitted within a buffer area. The report concludes that avoidance and minimization measures outlined in the report would ensure the ongoing protection of the ESHAs, despite work occurring within ESHA and within the ESHA buffer.

The report states that the no other feasible site is available to perform the work proposed within ESHA buffer since all work would be conducted within or adjacent to the existing developed roadway. The report also concludes that “the work proposed would maintain and improve existing drainage patterns,” and the ESHAs would “maintain their functional capacity” and “maintain natural species diversity.”

Finally, the report states that “all disturbed areas would be revegetated appropriately.” Caltrans provided the County with an *Onsite Revegetation Plan* dated October 2021. The *Revegetation Plan* proposes revegetation areas to restore areas surrounding waters of the United States impacted by construction utilizing a specific, regionally appropriate native seed mix. The revegetation would also limit introduction of invasive plant species within the project area.

The *ESHA Assessment*, as amended and supplemented, addresses the County’s standards for reduction of ESHA buffers and for development within an ESHA buffer. The report concludes that the proposed work would be consistent with the County’s ESHA requirements with the utilization of the recommended avoidance and minimization measures.

Work Within ESHA. MCC Section 20.496 specifies the types of development that can occur within certain ESHA types. The proposed project would require work within “other waters” and adjacent to wetland. MCC Section 20.496 permits “pipelines, utility lines and road and trail crossings when no less environmentally damaging alternative route is feasible” within riparian and wetland ESHA. The proposed roadway and drainage repairs are within or adjacent to the existing roadway, and the *ESHA Assessment* asserts that no less environmentally damaging alternative route is feasible. As a result, the project is consistent with the limited development allowances within or adjacent to wetland and “other water” ESHAs.

Avoidance and Minimization Measures: As described above, Caltrans is proposing various avoidance and minimization measures to ensure the protection of ESHA. In summary, the application documents include the following recommendations:

1. *ESHA Assessment.* Section 1.3 and Section 3.2 include standard measures, best management practices (BMPs) and avoidance and minimization efforts. Section 1.3 recommends BMPs to protect water quality, wetlands and other waters, natural communities, and animal species, and includes measures to limit the spread of invasive species. Section 3.2 recommends revegetation measures to address temporary impacts to ESHA.

Section 1.2 of the document describes additional measures to protect ESHA, including recommendations for THVF around ESHA. Section 1.2 also recommends measures for compliance with the Migratory Bird Treaty Act, such as limiting vegetation clearing during non-breeding seasons, or requiring nesting bird surveys within one week of clearing.

2. *Natural Environment Study and Addendum.* Section 1.2.1, as amended, includes BMPs to protect water quality, wetlands and other waters, natural communities, and animal species, and include measures to limit the spread of invasive species.
3. *Onsite Revegetation Plan.* Sections 4 through 8 include revegetation goals; a summary of revegetation activities; an implementation and maintenance schedule; monitoring methods, criteria and reporting requirements; and remedial measures. These approaches to revegetation are proposed to implement the BMPs described in the other resource documents, and to ensure consistency with County code policies regarding development in ESHA.
4. *Rare Plant Memo/Letter.* Pages 2-4 include avoidance and minimization measures to reduce

impacts to Bodega morning glory and Harlequin lotus. Specifically, seasonably appropriate surveys will determine if patches/occurrences of these rare plants are within 100 feet of project activities, and THVF will be installed to prevent disturbance of the species.

The project and supporting documentation were supplied to California Department of Fish and Wildlife (CDFW) for review and concurrence. MCC Section 20.496.020(A)(1) requires that CDFW concur that a 100-foot buffer is not necessary to protect site-specific resources from possible significant disruption. On September 10, 2021, CDFW Senior Environmental Scientist Jennifer Olson responded that a revegetation and monitoring plan, which was recommended by the *ESHA Assessment*, be prepared for the project to revegetate impacts to ESHA.

On October 21, 2021, Caltrans supplied the County with the above-mentioned *Onsite Revegetation Plan*. The document was referred to CDFW for review, and Ms. Olson responded that CDFW has no comments or concerns related to the revegetation plan.

The *Rare Plant Memo/Letter* to address rare plant ESHA was also referred to CDFW for review. Ms. Olson responded that CDFW believes the proposed avoidance and minimization measures appear sufficient to protect the ESHA.

Special Condition 11 ensures the project is implemented consistent with the various mitigations and recommendations outlined in the resource documents and summarized above.

Public Access: The proposed project is located on a stretch of SR1 adjacent to Navarro Point Preserve, a public "coastal access" area. At approximately PM 41.85, a driveway extends westward from SR1 to an existing public access parking lot. Caltrans provided the following information related to the public access:

The anticipated traffic control measures are reversing traffic control, moving lane closure, and shoulder closure. One-lane closure is permitted within the project limits. A minimum of 12 feet of paved roadway must be open for use by public traffic. Bicyclists will be accommodated through the work zone. Signage will be used to alert vehicle operators to the possible presence of bicyclists. The estimated maximum delay during one-way reversing traffic control will be 10 minutes. Access to side roads and residences will be maintained at all times.

As a result, the project would not impact any existing public access points along SR1.

MCC Section 20.528.010 requires that offers to dedicate easements for public access shall be recorded prior to issuance of a CDP in areas identified in Chapter 4 of the Coastal Element unless required public access has otherwise been secured. Chapter 4.9 of the Coastal Element addresses public access requirements in this subarea, defined as between Dark Gulch and the Navarro River. Chapter 4.9 requires a "blufftop trail along the Navarro Headlands west of Navarro Ridge Road." This required access is currently provided with the existing public access west of Navarro Ridge Road, which will be maintained during and after completion of the proposed project.

Hazards Management: The proposed project is exempt from CalFire requirements and will not result in an increased fire danger in any of the project locations. The proposed traffic management measures would ensure access through the work site is maintained for emergency vehicles. There are no other potential hazards associated with the proposed project.

Grading, Erosion, and Run Off: Grading would be required to perform the road widening work, and Caltrans has provided the following information relative to the cut and fill requirements

CUT (CY)	FILL (CY)	MAX HEIGHT OF CUT SLOPE (Ft)	MAX HEIGHT OF FILL SLOPE (Ft)	IMPORT (CY)	EXPORT (CY)
14,075	3,858	52, no steeper than 1.1:1	16, no steeper than 1.4:1	0	10,217

The project will result in a total export of 10,217 cubic yards of material. The applicant states that “excess material would be hauled off site to an approved disposal site under the responsibility of the contractor.” This is standard Caltrans practice where the contractor becomes the owner of the material and is responsible for appropriate disposal at an authorized site with its own environmental clearance. The contractor is required to provide proof of compliance to the Caltrans Resident Engineer (RE) prior to construction close out. The assurance of appropriate export disposal is identified in Caltrans Specifications and construction contract documents and the contractor is required to furnish proof of compliance, which shall be provided to the County in addition to the Caltrans RE, as recommended in Condition 9.

Erosion control planting will be implemented across the project area once construction is completed, as delineated on the project Plan Set. Additional revegetation efforts will be implemented consistent with the submitted *Onsite Revegetation Plan*. Final soil stabilization strategies include the use of compost, duff, hydraulic biotic growth medium, and a fiber reinforced matrix. Additional slope stabilization methods include RECP netting, compost socks, duff berms, and fiber rolls. Existing vegetation will be preserved to the maximum extent feasible. Erosion control methods include hydroseeding with a native species seed mix, consistent with the Plan Set (sheets ECL-1, EC-1, EC-2 and ECQ-1).

Archaeological/Cultural Resources: Caltrans prepared an Archaeological Survey Report (ASR) for the project area in January 2018. The report was provided to Mendocino County and to Sonoma State University’s Northwest Information Center (NWIC) for review. The ASR concludes that “as a result of the background research, literature review and pedestrian survey, no new or previously identified cultural resources are present within the Area of Potential Effect...[and] the project has no potential to affect historic properties.”

On August 30, 2021, NWIC responded that after reviewing the available documentation provided for this project and for other projects in the area that no additional studies were warranted. NWIC did provide recommended conditions of approval to be included with any approved Coastal Development Permit. NWIC recommended that the discovery of cultural or archaeological resources during construction are subject to the procedures outlined in the standard “Discovery Clause.”

Additionally, NWIC recommended Mendocino County contact local Native American tribes regarding traditional, cultural, and religious heritage values. The County referred the project to the Cloverdale Rancheria, Redwood Valley Rancheria, and the Sherwood Valley Band of Pomo Indians for additional comment. The notified tribes did not provide responses to the requests for comment.

With the NWIC recommended conditions of approval (Special Condition 8), the project is consistent with Mendocino County’s policies for protection of paleontological and archaeological resources.

Groundwater Resources: The project will not create an increase in the use of groundwater resources, nor will it affect existing groundwater resources in the area.

Transportation/Circulation: The project would widen and improve an existing roadway; however, the project would not increase the number of lanes, nor would it create or alter any land use that would cause an increase in traffic volume on the existing roadway. The project would provide improved circulation by making the existing corridor safer to motorists in both directions.

During construction, Caltrans proposes one-way controlled traffic and access will remain open to existing driveways, including the public access parking lot and trail west of the project.

Visual Resource and Special Treatment Areas: The entire project is located in a mapped Highly Scenic Area. Projects within mapped Highly Scenic Areas are subject to the development criteria prescribed in MCC Section 20.504.015(C). The development criteria require projects protect coastal views from public areas (including highways), limit development to less than 18 feet above natural grade, and requires new development be subordinate to the natural setting (and minimize reflective surfaces).

The proposed roadway improvements would be constructed well below the required height maximums in Highly Scenic Areas. Additionally, this corridor provides public views of scenic vistas on a narrow roadway with steep drops to the west, which may contribute to the unsafe conditions of this section of roadway. The proposed project would increase the safety of this highly scenic public area.

The improvements include the installation of a Midwest Guardrail System (MGS) along the west edge of the roadway. The proposed MGS would be treated with a light brown stain in order to reduce glare and for the improvement to better blend with the natural surroundings. As a result, the project would be consistent with the development criteria for Highly Scenic Areas in MCC Section 20.504.015(C).



Proposed Midwest Guardrail System with light brown stain

Lands west of the roadway are designated Tree Removal Areas. The proposed project includes the removal of up to 75 trees, all of which are located on the west side of the roadway within the mapped Tree Removal Area. MCC Section 20.504.015(C) includes a standard that in specified areas on the Land Use Maps (i.e., Tree Removal Areas), “tree thinning or removal shall be made a condition of permit approval” when trees “unreasonably obstruct views to and along the ocean and scenic coastal areas.” The proposed tree removal is consistent with this policy intended to improve public views of the coast.

ENVIRONMENTAL DETERMINATION: For the purposes of CEQA, Caltrans is the Lead Agency, meaning Caltrans has the primary responsibility for carrying out or approving a project. Mendocino County is a Responsible Agency, meaning a public agency other than the lead agency with a responsibility for carrying out or approving a project.

As Lead Agency, Caltrans determined that the project is Categorically Exempt from CEQA, meaning the proposed work falls within a class of projects that do not have a significant effect on the environment. Specifically, Caltrans determined the project is Categorically Exempt under Section 15301, Class 1(d), which applies to restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety. The full Caltrans Notice of Exemption (SCH 2019-038511) is included as Attachment S.

PROJECT FINDINGS AND CONDITIONS: Pursuant to the provisions of Chapter 20.532 and Chapter 20.536 of the Mendocino County Code, the Coastal Permit Administrator approves the proposed project, and adopts the following findings and conditions.

FINDINGS:

1. Pursuant to MCC Section 20.532.095(A)(1), the proposed development is in conformity with the certified Local Coastal Program. The project would be located within, adjacent to, and within 100 feet of ESHA; however, appropriate protection measures have been incorporated into the project and have been reviewed and agreed upon by resource agencies to ensure continued protection of the resources. The project proposes improvements to SR1 to support public safety; and

2. Pursuant to MCC Section 20.532.095(A)(2), the proposed development will be provided with adequate utilities, access roads, drainage, and other necessary facilities. No utilities are necessary to accommodate the project. The project proposes to enhance SR1 by providing standard travel ways and shoulders to increase public safety through the project corridor. Drainage facilities that would be affected by the project would be replaced and improved to better facilitate runoff and stormwater surrounding the roadway; and
3. Pursuant to MCC Section 20.532.095(A)(3), the proposed development is consistent with the purpose and intent of the Zoning District, as well as all other provisions of Division II of Title 20 of the Mendocino County Code. The majority of the work would occur within the State right-of-way, which is currently developed with an existing two-lane highway. Project components outside the right-of-way include grading and vegetation removal. The proposed project would not change the current land use, nor cause any other changes that would conflict with zoning adjacent to the roadway; and
4. Pursuant to MCC Section 20.532.095(A)(4), the proposed development would not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act. Caltrans, as Lead Agency, determined that the project is Categorically Exempt from CEQA under Section 15301, Class 1(d). Class 1(d) finds that "restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety" are exempt from the provisions of CEQA. Caltrans, as Lead Agency, determined the project meets this criterion, and therefore will not have any significant adverse impacts on the environment within the meaning of CEQA.
5. Pursuant to MCC Section 20.532.095(A)(5), the proposed development would not have any adverse impact on any known archaeological or paleontological resources, as there are no known resources within the vicinity of the site and Standard Condition 8 is in place when archaeological sites or artifacts are discovered; and
6. Pursuant to MCC Section 20.532.095(A)(6), other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed development. The project would not contribute new sources of traffic on local and regional roadways. The proposed project is being undertaken to improve public safety within this corridor of SR1; and
7. Pursuant to MCC Section 20.532.095(B), the proposed development would not diminish public access to Mendocino County coastal areas and conforms to the goals and policies of the Coastal Element of the General Plan. All existing public access within the vicinity of the project area will be accessible throughout construction activities; and
8. Pursuant to MCC Section 20.532.100(A)(1), the proposed development is consistent with ESHA policies that require the following findings: (a) The resources as identified will not be significantly degraded by the proposed development; (b) There is no feasible less environmentally damaging alternative; (c) All feasible mitigation measures capable of reducing or eliminating project related impacts have been adopted. SR1 is located through this area such that there cannot be buffers from all identified ESHA and there is on other feasible less environmentally damaging alternative. The Applicant has provided documentation to demonstrate the resources identified will not be significantly degraded and all feasible conditions of approval have been included.

CONDITIONS OF APPROVAL:

1. This action shall become final on the 11th day following the decision unless an appeal is filed pursuant to Section 20.544.015 of the Mendocino County Code. The permit shall become effective after the 10 working day appeal period to the Coastal Commission has expired and no appeal has been filed with the Coastal Commission. The permit shall expire and become null and

void at the expiration of two years after the effective date except where construction and use of the property in reliance on such permit has been initiated prior to its expiration.

2. To remain valid, progress towards completion of the project must be continuous. The Applicants have sole responsibility for renewing this application before the expiration date. The County will not provide a notice prior to the expiration date.
3. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.
4. This permit shall be subject to the securing of all necessary permits for the proposed development from County, State and Federal agencies having jurisdiction.
5. The Applicants shall secure all required building permits for the proposed project as required by the Building Inspection Division of the Department of Planning and Building Services.
6. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:
 - a. The permit was obtained or extended by fraud.
 - b. One or more of the conditions upon which the permit was granted have been violated.
 - c. The use for which the permit was granted is conducted so as to be detrimental to the public health, welfare or safety, or to be a nuisance.
 - d. A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective, or has enjoined or otherwise prohibited the enforcement or operation of one or more such conditions.
7. This permit is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.
8. If any archaeological sites or artifacts are discovered during site excavation or construction activities, the property owner shall cease and desist from all further excavation and disturbances within 100 feet of the discovery, and make notification of the discovery to the Director of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.
9. The contractor performing the work shall provide proof of appropriate disposal of exported material to both the Caltrans Resident Engineer and the County prior to close out of construction.
10. Any disturbed soil after construction shall be scarified and seeded with California native seed mix that is regionally appropriate to the area. Disturbed soil is defined as cut, fill, and/or compaction to existing grade.
11. Project implementation shall be consistent with the recommended mitigations, BMPs, and avoidance and minimization measures outlined in Sections 1.2, 1.3, and 3.2 of the *ESHA Assessment*, June 2019 (Exhibit A), Section 1.2.1 of the *Natural Environment Study*, September 2017 and its *Addendum*, November 28, 2018 (Exhibit B), Sections 4 through 8 of the *Onsite Revegetation Plan* (Exhibit C), and Pages 2-4 of the *Rare Plant Memo/Letter* (Exhibit D) intended to protect ESHA.

DATE

JULIA KROG

Appeal Period: 10 Days
Appeal Fee: \$1616.00

ATTACHMENTS:

- A. Location Map
- B. Aerial Imagery
- C. Topographic Map
- D. LCP Land Use Map 19: Navarro
- E. Zoning Display Map
- F. Estimated Slope
- G. Biological Resources Map
- H. LCP Habitats & Resources
- I. Wetlands
- J. Fire Hazard Zones and Responsibility Areas
- K. Soil Classifications
- L. Highly Scenic and Tree Removal Areas
- M. Adjacent Properties
- N. Applicant's Statement
- O. ESHA Map – North
- P. ESHA Map – Mid
- Q. ESHA Map – South
- R. ESHA Map – Staging
- S. ESHA Map - Rare Plants
- T. Categorical Exemption

Exhibit A – *ESHA Assessment Measures*

Exhibit B – *Natural Environment Study Measures*

Exhibit C – *Onsite Revegetation Plan Measures*

Exhibit D – *Rare Plant Memo/Letter Measures*

EXHIBIT A
(ESHA Assessment Measures)

1.2 Project Description

Caltrans proposes to make safety improvements and perform rehabilitation in Mendocino County on SR 1 from post mile (PM) 41.8 to PM 42.3. The project proposes to widen the existing lane to 12 feet, widen the existing shoulders in both directions to 4 feet, install edge

line and centerline rumble strips, install a Midwest Guardrail System (MGS), improve the superelevation, and remove trees. Work would also involve installing four new culverts, replacing three existing culverts, installing nine new drainage inlets (DIs), removing nine DIs, and extending five culverts. Rock slope protection (RSP) would be placed at the outlets of all culverts, specific measurements of RSP are provided in Section 3.1.

At PM 41.79, the existing 6 foot box culvert would remain at the same location. At PM 41.83, the existing 18 inch culvert would be abandoned, the existing slot drain and DIs would be removed, four new DIs, three new 24 inch culverts and 18 inch culverts would be installed. At PM 41.95, the existing 18 inch culvert would be extended, the existing DI would be removed, and a new DI would be installed. At PM 41.98, the existing 18 inch culvert would be extended, the existing DI would be removed, and a new DI would be installed. At PM 42.02, the existing 24 inch culvert would be replaced and extended, the existing DI would be removed, and a new DI would be installed. At PM 42.11, the existing 18 inch culvert would be replaced and extended, the existing DI would be removed, and a new DI would be installed. At PM 42.26, the existing 18 inch culvert would be replaced and extended, the existing DI would be removed, and a new DI would be installed.

The construction of the new shoulders would involve the excavation of existing material and the placement of a new structural section. The structural section would consist of 1.30 feet of class 2 aggregate base, 0.40 foot of hot mix asphalt (type A), and 0.08 foot of bonded wearing course (BWC-G). This structural section would help seal longitudinal pavement joints and provide a good surface for receiving new striping. A layer of geosynthetic pavement interlayer (GPI) would be used at the pavement joint where the new section meets the existing material.

The new MGS installed from PM 42.11 to PM 42.30 would include both standard sections and 7 foot post segments in narrow roadway locations. Also, a new Omit One Post (MGS) would be installed from PM 41.78 to PM 41.80 to span the inlet and outlet of the 6 foot box culvert on both sides of State Route (SR) 1. The MGS to be installed within the project limit would be treated with a light-brown stain to reduce glare and to blend the MGS into the visual character of the natural landscape.

Erosion has been occurring below the culvert outlet at PM 42.11. To prevent further erosion at this location, which could compromise the highway, the existing down drain, which is failing, would be removed and replaced with a rock-lined ditch and ¼ ton of rock slope protection (RSP). The existing culvert at this location, which is also failing, would be replaced.

EXHIBIT A

(ESHA Assessment Measures)

Below many of the existing cutslopes, an inboard ditch carries storm water between culvert inlets. An additional 2 feet of widening beyond the shoulder is included to provide space for this water.

Sixty two (62) trees are to be removed on State Right Of Way and thirteen (13) trees are to be removed within a Temporary Construction Easement (TCE) respectively.

The anticipated traffic control measures are reversing traffic control, moving lane closure, and shoulder closure. One-lane closure is permitted within the project limits. A minimum of 12 feet of paved roadway must be open for use by public traffic. Bicyclists would be accommodated through the work zone. Signage would be used to alert vehicle operators to the possible presence of bicyclists. The estimated maximum delay during one-way reversing traffic control would be 10 minutes. Access to side roads and residences would be maintained at all times.

Construction Equipment

Equipment needed to perform the work includes support vehicles, dump trucks, pickup trucks, hauling trucks, backhoe, trencher, pile driver, drilling rigs/augers, paver, rollers, concrete saw, jackhammer, generators, grinders, compressors, concrete saws, other handheld power tools, and drums to store debris from surface preparation work.

Construction Schedule

It is anticipated that construction would be completed within one year but could be longer depending on the contractor and seasonal work window restrictions defined in permit requirements.

Areas for Contractor Use (Staging Areas)

Areas for Contractor Use have been identified on the north end of the project in existing pullouts on the west and east side of SR 1. Maps showing these areas are shown in Figure 7 of Appendix A.

Clearing and Grubbing

The contractor would remove all vegetation and debris within the right of way (ROW) and within temporary construction easements as specified, except for environmentally sensitive habitat areas (ESHAs) that require preservation. ESHAs would be protected with the use of high visibility fencing (HVF). Sixty two (62) trees are to be removed on State right of way

EXHIBIT A
(ESHA Assessment Measures)

and thirteen (13) trees removed on the Temporary Construction Easement (TCE). Of the 75 trees in total, 45 of the trees are alive (12 Bishop pines, 32 Monterey Pines and 1 Douglas-fir), 15 are dead standing trees (most likely Monterey pines), and 15 are stumps. These trees may be removed for construction access and widening activities. While the Bishop Pine Forest is considered a vulnerable community (G3/S3), the small number of Bishop pines that are mixed in with Monterey pines are likely planted by land owners for privacy and are likely invading disturbed coastal prairie habitat. Therefore, closed-cone pine-cypress plant community is not considered an ESHA for this project.

In compliance with the Migratory Bird Treaty Act, vegetation clearing would be limited to September 1st to February 28th or if vegetation removal is required during the breeding season, a nesting bird survey would be conducted by a qualified biologist within one week of removal. Vegetation that is cleared and grubbed may be collected and processed into duff by grinding or chipping. Duff may be stockpiled until placed on the planned revegetation areas. Alternately, Type D Erosion Control may be used which would be a combination of hydroseeding, straw, and fiber application. Access and staging areas would be cleared as necessary to move and store material and equipment around the project site. Equipment used to clear and grub vegetation would likely include backhoes, chain saws, mowers, chippers, and hand tools.

Grading and Fill

Lanes would be widened to 12 feet, and shoulders would be widened to 4 feet. The construction of the new shoulders would require excavation of material from the east side of the road and placement of a new structural section. The catch slope would most likely be 2:1. Total amount of anticipated cut material is 6766 cubic yards, at a maximum height of 30 feet. Total amount of anticipated fill material is 3462 cubic yards, at a maximum height of 20 feet.

Construction of new shoulders would include excavating existing material and placing a new shoulder structural section that would consist of 0.65 feet of Class 2 Subbase, 0.75 feet of Class 2 Subbase, and 0.45 feet of hot asphalt mix (Type A). Additional items include restriping, installation of edge line and centerline rumble strip, and dike replacement.

Revegetation and Plant Establishment

After all construction materials are removed, the site would be restored to a natural setting by grading, placing erosion control, and replanting. Replanting would be subject to a plant establishment period as defined by permits, which would require Caltrans to adequately water plants, replace unsuitable plants, weed, and control pests.

EXHIBIT A
(ESHA Assessment Measures)

Right of Way

A temporary construction easement would be required for the proposed build alternative from private landowners for the culvert outlet work. It is anticipated no other temporary or permanent right of way would be required. Right of way fencing that has been undermined within the area of erosion would be reconstructed after construction is complete.

1.3 Project Features, Standard Measures, and Best Management Practices

The following section provides a list of project features, standard practices, and best management practices (BMPs) that are included as part of the project description. These avoidance and minimization measures are prescriptive and sufficiently standardized to be generally applicable, and do not require special tailoring to a project situation. These are generally measures that result from laws, permits, guidelines, and resource management plans that are relevant to the project. They contain refinements in planning policies and implementing actions. These practices predate the project's proposal and apply to all similar projects. For this reason, these measures and practices do not qualify as project mitigation, and the effects of the project are analyzed with these measures in place. Any project-specific measures that would be applied to reduce the effects of project impacts are listed in relevant sections of Chapter 3.

Standard measures relevant to the protection of natural resources deemed applicable to the proposed project include the following:

Water Quality and Storm Water Runoff

WQ-1: Construction site BMPs would follow the latest edition of the Construction Site Best Management Practices Manual (Caltrans 2017b) to control and minimize the impacts of construction-related activities, materials and pollutants on the watershed.

WQ-2: The project would comply with Caltrans Standard Specifications for Water Pollution Control and Job Site Management (Caltrans 2018). Caltrans' Standard Specifications require the contractor to submit a Water Pollution Control Plan for projects with a disturbed soil area (DSA) of less than one acre for review and approval by the resident engineer. The Water Pollution Control Plan would implement storm water and water pollution control training, routine BMP inspections, spill prevention and control, materials and waste management and non-storm water management.

EXHIBIT A
(ESHA Assessment Measures)

Wetlands and Other Waters

WW-1: The contractor would be required to place high visibility fencing (HVF) along the boundaries of all riparian, wetland or other environmentally sensitive areas adjacent to the project footprint.

WW-2: Revegetation would take place on-site after construction to address permanent and temporary impacts to other waters of the U.S. and associated riparian areas resulting from the proposed project. All disturbed soil areas would be planted with regionally appropriate native plants. Caltrans would remove non-native and invasive plants within disturbed soil areas as needed during the plant establishment period. Planting ratios would be determined following updated guidance from USACE, NCRWQCB, and County of Mendocino Department of Planning and Building (MDP&BS). A Revegetation Plan would be submitted during the permitting phase of the project to address all project requirements.

WW-3: The construction footprint would be reduced to the maximum extent feasible.

Natural Communities

NC-1: After construction materials are removed, the project area would be revegetated. Replanting would be subject to a plant establishment period as defined by project permits, which would require Caltrans to adequately water plants, replace unsuitable plants, and control pests. Caltrans would implement a program of invasive weed control in all areas of soil disturbance caused by construction to improve habitat for native species in and adjacent to disturbed soil areas within the project limits.

NC-2: The contractor would be required to place temporary HVF along the boundaries of environmentally sensitive areas to avoid impacts to sensitive habitats that occur adjacent to the project footprint.

Animal Species

AS-1: To protect migratory and nongame birds, their occupied nests and eggs, nesting prevention measures would be implemented. Vegetation removal would be restricted to the period outside the bird breeding season (September 1 through February 28), or if vegetation removal is required during the breeding season, a nesting bird survey would be conducted by a qualified biologist within one week of removal. If an active nest were located, the biologist would coordinate with the California Department of Fish and Wildlife (CDFW) to establish appropriate species-specific buffer(s) and any monitoring requirements. The buffer(s) would

EXHIBIT A
(ESHA Assessment Measures)

be delineated around each active nest, and construction activities would be excluded from these areas until birds have fledged, or the nest is determined to be unoccupied.

AS-2: Pre-construction surveys for active raptor nests would be conducted by a qualified biologist within 15 days prior to the initiation of construction activities. Areas to be surveyed would be limited to those areas subject to increased disturbance because of construction activities (i.e., areas where existing traffic or human activity is greater than or equal to construction-related disturbance need not be surveyed). If any active raptor nests were identified, appropriate conservation measures (as determined by a qualified biologist) would be implemented. These measures may include, but are not limited to, establishing a construction-free buffer zone around the active nest site, biological monitoring of the active nest site, and delaying construction activities near the active nest site until the young have fledged.

- Raptor surveys would be primarily focused on the cliffs below the culvert at PM 42.11, which is the area within the project vicinity that is the most conducive to raptor nesting.

Invasive Species

IS-1: To prevent the spread of invasive plant species in disturbed soil after construction, all disturbed areas would be seeded with native herbaceous species and weed-free mulch would be applied.

IS-2: Construction equipment would be inspected and cleaned to remove invasive species and/or pathogens before being brought to the project site and prior to removal from the project area.

EXHIBIT A
(ESHA Assessment Measures)

3.2 Avoidance and Minimization Efforts

Measures as described in Section 1.3 *Project Features, Standard Measures, and Best Management Practices* of this report, would be implemented to avoid and minimize impacts to regulated wetlands and other waters in the BSA. In addition, Caltrans would ensure that applicable BMPs are used to stabilize all bare soil areas over both the short term and long term and to minimize adverse effects to water quality, aquatic habitat, and aquatic species. BMPs include treatment controls, soil stabilization practices, and weather-appropriate scheduling. HVF would be used to limit ground disturbance to sensitive areas within the project footprint, and debris containment plans would be implemented to ensure construction debris does not enter adjacent waters. Any debris and sediment would be contained within the project site and disposed off-site. Restoration of the historic channel is written into the project purpose and need.

Soils from the ephemeral drainages and roadside ditches with wetland characteristics that would be impacted by the proposed road widening would be stored and stockpiled as described in Standard Special Provision (SSP) 19-2.03D(2). This measure helps to preserve the seed stock and species diversity of the original sites and will improve the post construction habitat at the improved culvert inlets and roadside ditches.

Revegetation would take place on-site after construction to address temporary impacts to other waters of the U.S. and associated riparian areas resulting from the proposed project. All disturbed soil areas would be planted with regionally appropriate native plants. Caltrans would remove non-native and invasive plants within disturbed soil areas as needed during the plant establishment period. Planting ratios would be determined following updated guidance from USACE, NCRWQCB, and MDP&BS. A Revegetation Plan would be submitted to address all requirements for the project.

EXHIBIT B
(Natural Environment Study Measures)

Update to Section 1.2.1 Build Alternative: Project Features, Standard Measures and Best Management Practices

The following section provides a list of project features, standard practices, and best management practices (BMPs) that are included as part of the project description. These avoidance and minimization measures are prescriptive and sufficiently standardized to be generally applicable, and do not require special tailoring to a project situation. These are general measures that result from laws, permits, guidelines, and resource management plans that are relevant to the project. They contain refinements in planning policies and implementing actions. These practices predate the project's proposal and apply to all similar projects. For this reason, these measures and practices do not qualify as project mitigation, and the effects of the project are analyzed with these measures in place. Any project-specific mitigation measures that would be applied to reduce the effects of project impacts are listed in relevant sections of Chapter 4 of the NES (Caltrans 2017).

Standard measures relevant to the protection of natural resources deemed applicable to the proposed project include the following:

EXHIBIT B
(Natural Environment Study Measures)

Water Quality and Storm Water Runoff

WQ-1: Construction site BMPs would follow the latest edition of the Construction Site Best Management Practices Manual (Caltrans 2017b) to control and minimize the impacts of construction-related activities, materials and pollutants on the watershed.

WQ-2: The project would comply with Caltrans Standard Specifications for Water Pollution Control and Job Site Management (Caltrans 2015). Caltrans' Standard Specifications require the contractor to submit a Water Pollution Control Plan for projects with a disturbed soil area (DSA) of less than one acre for review and approval by the resident engineer. The Water Pollution Control Plan would implement storm water and water pollution control training, routine BMP inspections, spill prevention and control, materials and waste management and non-storm water management.

Wetlands and Other Waters

WW-1: The contractor would be required to place high visibility fencing (HVF) along the boundaries of all riparian, wetland or other environmentally sensitive areas adjacent to the project footprint. After construction is complete, the contractor would be required to remove and dispose of HVF at a nearby recycling facility.

WW-2: Revegetation would take place on-site after construction to address permanent and temporary impacts to other waters of the U.S. and associated riparian areas resulting from the proposed project. All disturbed soil areas would be planted with regionally appropriate native plants. Caltrans would remove non-native and invasive plants within disturbed soil areas as needed during the plant establishment period. Planting ratios would be determined following updated guidance from USACE, NCRWQCB, and County of Mendocino Department of Planning and Building (MDP&BS). A Revegetation Plan would be submitted during the permitting phase of the project to address all project requirements.

WW-3: The construction footprint would be reduced to the maximum extent feasible.

Natural Communities

NC-1: After all construction materials are removed, the project area would be revegetated. Replanting would be subject to a plant establishment period as defined by project permits, which would require Caltrans to adequately water plants, replace unsuitable plants, and control pests.

EXHIBIT B
(Natural Environment Study Measures)

Caltrans would implement a program of invasive weed control in all areas of soil disturbance caused by construction to improve habitat for native species in and adjacent to disturbed soil areas within the project limits.

NC-2: The contractor would be required to place HVF along the boundaries of riparian, wetland or other environmentally sensitive areas on land to avoid impacts to sensitive habitats that occur adjacent to the project footprint. After construction is complete, the contractor would be required to remove and dispose of HVF at a nearby recycling facility.

Animal Species

AS-1: To protect migratory and nongame birds, their occupied nests and eggs, nesting prevention measures would be implemented. Vegetation removal would be restricted to the period outside of the bird breeding season (September 1 through February 28), or if vegetation removal is required during the breeding season, a nesting bird survey would be conducted within one week of removal by a qualified biologist. If an active nest were located, the biologist would coordinate with the California Department of Fish and Wildlife (CDFW) to establish appropriate species-specific buffer(s) and any monitoring requirements. The buffer would be delineated around each active nest, and construction activities would be excluded from these areas until birds have fledged, or the nest is determined to be unoccupied.

Invasive Species

IS-1: To prevent the spread of invasive plant species in disturbed soil after construction, all disturbed areas would be seeded with native herbaceous species and weed-free mulch would be applied.

IS-2: Construction equipment would be inspected and cleaned to remove invasive species and/or pathogens before being brought to the project site and prior to removal from the project area.

EXHIBIT C
(Onsite Revegetation Plan Measures)

4) Revegetation Goals

The revegetation goals are (1) to restore areas surrounding Waters of the United States impacted by construction utilizing a specific, regionally-appropriate native seed mix developed by Caltrans Landscape Architecture in collaboration with the Revegetation Specialist and (2) to limit new introduction of invasive plant species within the project area which are rated “High” by the California Invasive Plant Council (Cal-IPC). One invasive species currently growing onsite is Himalayan blackberry (*Rubus armeniacus*) and Caltrans will not attempt to eradicate this Cal-IPC high rated species onsite.

5) Summary of Revegetation Activities

a) Erosion Control

Upon completion of construction, in areas where ground disturbance occurs, a specific erosion control seed mix using regionally-appropriate native species will be utilized in bare soil areas. To restore species structure and diversity, this specific seed mix will contain native grasses, herbs, and woody shrubs to restore species structure and diversity. These species are characteristic of coastal bluff habitat. Erosion control measures are specifications managed by Construction and Landscape Architecture and by Maintenance after construction is complete.

b) Plant Species and Quantities

The erosion control seed mix was designed to take the place of planting. No additional container plants are proposed for this project due to minimal impacts and safety concerns. A specific native seed mix will be applied to areas of disturbance. Table 2 below contains species and germination information for the seed mix. Natural vegetation recruitment (volunteers) and resprouting native vegetation is anticipated to support success of the revegetation.

EXHIBIT C
(Onsite Revegetation Plan Measures)

Table 2. Native Seed Mix

Botanical Name	Common Name	Pounds Pure Live Seed Per Acre
<i>Achillea millefolium</i>	common yarrow	0.5
<i>Acmispon americanus</i>	Spanish clover	3
<i>Artemisia douglasiana</i>	California mugwort	1
<i>Baccharis pilularis</i>	coyote brush	1
<i>Bromus carinatus</i>	California brome	17
<i>Danthonia californica</i>	California oatgrass	11
<i>Diplacus aurantiacus</i>	sticky monkeyflower	0.5
<i>Eriophyllum staechadifolium</i>	seaside wooly sunflower	2
<i>Festuca microstachys</i>	small fescue	4
<i>Festuca rubra</i>	red fescue	5

c) Proposed Revegetation Areas

The proposed revegetation areas include Drainage 2 and Drainage 3 at PM 41.83 and 41.84, respectively; Drainage 5 at PM 41.98; and Drainage 8 at PM 42.26 at both the inlets and outlets where disturbance is proposed to occur. These areas will be monitored to assess the establishment of the native seed mix and recruitment of native plants. Monitoring for the presence and abundance of newly introduced invasive species rated “High” by Cal-IPC will also occur.

6) Implementation and Maintenance Schedule

At the end of the construction period, hydroseed will be applied by a qualified contractor. Weeding will be performed by Caltrans staff when necessary during the three-year maintenance and monitoring period. Timing of weeding will take into consideration the blooming period of any newly introduced Cal-IPC rated “High” invasive species that germinate onsite to prevent these plants from producing seeds and spreading.

EXHIBIT C
(Onsite Revegetation Plan Measures)

7) Monitoring Methods, Success Criteria, and Reporting

a) Monitoring Methods and Schedule

- i) **Photo Points:** Reproducible photo points will be established at the revegetation areas before and after construction. Photo points will visually indicate presence and abundance of newly introduced invasive species, as well as establishment of native plant species, over the three years of monitoring. Photo points may be re-established prior to first year monitoring to account for changes in the landscape due to construction and to provide the best view of revegetation areas. Photos of drainage facilities 2 and 3, 5, and 8 are provided in Appendix B.
- ii) **Presence of Invasive Plant Species:** At Drainages 2 and 3, 5, and 8, presence of newly introduced invasive plant species rated “High” by Cal-IPC will be monitored and documented. Baseline ocular cover estimates will be obtained prior to construction and subsequent monitoring data will be collected by ocular estimates.
- iii) **Schedule:** Caltrans will monitor the revegetation areas annually. Invasive species presence will be monitored to assess progress toward fulfilling revegetation goals and identify remedial or adaptive management measures that may be required. Photo monitoring will also occur annually. First year monitoring at this location will take place in the first growing season following completion of construction.

b) Success Criterion

Year 3 Success Criterion

Relative cover of invasive species rated “High” by Cal-IPC will be less than or equal to pre-construction conditions.

EXHIBIT C
(Onsite Revegetation Plan Measures)

c) Revegetation Monitoring Reports

Revegetation monitoring reports will be submitted for Years 1 and 3 to all agencies requiring revegetation monitoring reports. Monitoring reports will be simple in nature and will include a brief summary of monitoring results, discuss whether the revegetation area appears to be on a trajectory towards success of the goals, and will include any proposed remedial measures to ensure success. Monitoring reports will also include photo points. The final monitoring report will discuss whether the success criterion was met and whether remedial actions are needed, or if revegetation is considered complete. Revegetation monitoring data and photos for Year 2 will be saved to the project file and made available upon request.

8) Remedial Measures

If the success criteria are not met, the Revegetation Specialist will assess potential reasons and develop remedial measures or adaptive management strategies to correct issues. Caltrans will coordinate with the permitting agencies that require revegetation and reporting to discuss success criteria issues, propose solutions, and determine the best course of action. Any remedial measures that are implemented will be discussed in monitoring report(s).

EXHIBIT D
(Rare Plant Memo/Letter Measures)

Bodega Morning Glory

A few small and isolated patches of Bodega morning glory were found in the Biological Study Area (BSA), one of which is near the southern project limits in the Coastal Scrub habitat on the hillslope to the east of the highway (Enclosure 2: Figure A-9). *Calystegia purpurata*, subspecies *saxicola* is similar in appearance and difficult to distinguish from the more common Pacific false bindweed (*C. p. ssp. purpurata*). Bodega morning glory was differentiated from Pacific false bindweed based on leaf and bract characteristics (Enclosure 2: Figure A-10). However, there were many plants in the project area that had characteristics of both subspecies. Based on the overall distribution of both subspecies available in the Calflora Database, it appears that the project vicinity most likely represents an area of integration of the two subspecies and does not solely consist of the rarer subspecies (Caltrans 2018). Bodega morning glory has a California Native Plant Society (CNPS) Rare Plant ranking of 1B.2, or "rare, moderately threatened in California and elsewhere" (California Department of Fish and Wildlife [CDFW] 2021).

Based on an analysis of the proposed activities and the mapped extent of the species shown in the 2017 NES, it appears that the observation nearest the construction activity is within the 100-foot buffer of the edge of the proposed road cut. Analysis of ESHA within the 100-foot buffer is required by Section 20.496.00 of the Mendocino County Coastal Zoning Code.

As provided for in Section 20.496.020(4) of the Mendocino County Coastal Zoning Code, development is permitted within a buffer zone if specific findings can be made. Based on the location and nature of the proposed work, no impacts to the species is anticipated as it is outside and upslope of the construction area. Furthermore, the proposed construction activities would not diminish the functional capacity of the surrounding habitat, the ability of the patch or its grassland habitat to be self-sustaining or maintain a natural species diversity. There is no other feasible location to widen the road without increasing the potential environmental impacts. As mentioned, the patch of *Bodega Morning Glory* is located upslope and well beyond the footprint of construction and is therefore well placed to avoid direct and indirect impacts from construction and ensure its ability to be self-sustaining.

EXHIBIT D
(Rare Plant Memo/Letter Measures)

Avoidance and Minimization Measures

Prior to groundbreaking activities, a qualified biologist will complete seasonally appropriate biological surveys to locate the western extent of the patch of *Calystegia* identified in the 2017 NES at the southeastern side of the proposed project (Enclosure 2: Figure A-9). If the patch is shown to be within the 100ft buffer required by Mendocino County Coastal Zoning Code, Temporary High Visibility Fencing (THVF) will be placed along the edge of the patch closest to construction activities to prevent disturbance of the species.

Harlequin Lotus (*Hosackia gracilis*)

Harlequin lotus (*Hosackia gracilis*) was positively identified in a few isolated patches in the BSA, including a few that were near the project construction limits (Enclosure 2: Figures A-8, A-9). Most observations were in a slightly mesic area in the Perennial Grasslands on Navarro Point Preserve, although some plants were also found in dry, grassland openings in the Coastal Scrub habitat to the east of the highway (Caltrans 2018). Harlequin lotus has a California Native Plant Society (CNPS) Rare Plant ranking of 4.2, or "plants of limited distribution; fairly threatened in California" (CDFW, 2021). Harlequin lotus is considered the host plant for the federally listed Lotus blue butterfly. As discussed in the 2019 ESHA Analysis, the lotus blue butterfly has not been identified in the area since the mid-1980s and no impact to this species is anticipated (Caltrans 2019). The proposed project will not result in permanent or temporary impacts to this taxon as none were found in the proposed right-of-way or where any permanent and temporary construction disturbances will occur.

Avoidance and Minimization Measures

A comparison of the mapped instances of the Harlequin lotus in the 2017 NES and the 100ft buffer line show that most the individuals identified in the 2017 NES are outside of the buffer line. However, an occurrence on the south west side of the project area may be partially within the 100-foot buffer line (Enclosure 2: Figure A-9, Figure 5). Therefore, prior to groundbreaking activities, a qualified biologist will complete seasonally appropriate biological surveys to identify any individual or patches of *Hosackia* within the 100ft buffer at the locations identified in the 2017 NES (Enclosure 2; Figure A-9) (Caltrans 2018). If any individual plants or patches are shown to be within the 100ft buffer required by the Mendocino County Coastal Zoning Code, THVF will be placed along the edge of the patch closest to construction activities to prevent disturbance of the species.

Albion Bridge Stewards

A working group of the Albion Community Advisory Board

P.O. Box 363
Albion, CA 95410

BY ELECTRONIC MAIL
NorthCoast@coastal.ca.gov

April 25, 2022

California Coastal Commission-
North Coast District
CDP Appeal Intake Staff
1385 8th Street, Suite 130
Arcata, California 95521

RE: APPEAL OF MENDOCINO COUNTY BOARD OF
SUPERVISORS ACTION RE CASE#2019-0024
(CALTRANS DISTRICT 1, HIGHWAY 1, ALBION)

Dear Staff of the Commission,

Enclosed please find the appeal, in Exhibits 1-5 to this transmittal letter, by the Albion Bridge Stewards and Co-Appellants of the action by the Mendocino County Board of Supervisors to "affirm" the prior action by the County Coastal Permit Administrator in the above-referenced Coastal Development Permit 2019-0024 matter.

Thank you, in advance, for advising me by reply email before 5 pm today when you have received this appeal.

Respectfully submitted on behalf of the Albion Bridge Stewards and Co-Appellants, by:

Jim Heid

c: Ms. Melissa Kraemer, Manager, CCC-North Coast District
Melissa.Kraemer@coastal.ca.gov
Ms. Amber Leavitt, Transportation Program Analyst, CCC-
North Coast District
Amber.Leavitt@coastal.ca.gov
Mr. Richard Mullen, Deputy Director, Caltrans District 1
richard.mullen@dot.ca.gov demling
Mr. Frank Demling, Project Manager, Caltrans District 1
frank.demling@dot.ca.gov

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

Exhibit 10 – Appeal Filed
Appeal No. A-1-MEN-22-0014 (Caltrans)
Navarro Ridge Safety Project
Page 1 of 34

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
1385 EIGHTH STREET, SUITE 130
ARCATA, CA 95521
(707) 826-8950
NORTHCOAST@COASTAL.CA.GOV

**APPEAL FORM****Appeal of Local Government Coastal Development Permit****Filing Information (STAFF ONLY)**

District Office: North Coast

Appeal Number: A-1-MEN-22-0014Date Filed: April 25, 2022 (via email to NorthCoast@coastal.ca.gov)Appellant Name(s): Albion Bridge Stewards and Co-Appellants**APPELLANTS**

IMPORTANT. Before you complete and submit this appeal form to appeal a coastal development permit (CDP) decision of a local government with a certified local coastal program (LCP) to the California Coastal Commission, please review [the appeal information sheet](#). The appeal information sheet describes who is eligible to appeal what types of local government CDP decisions, the proper grounds for appeal, and the procedures for submitting such appeals to the Commission. Appellants are responsible for submitting appeals that conform to the Commission law, including regulations. Appeals that do not conform may not be accepted. If you have any questions about any aspect of the appeal process, please contact staff in the Commission district office with jurisdiction over the area in question (see the Commission's [contact page](#) at <https://coastal.ca.gov/contact/#/>).

Note regarding emailed appeals. Please note that emailed appeals are accepted ONLY at the general email address for the Coastal Commission district office with jurisdiction over the local government in question. For the North Coast district office, the email address is NorthCoast@coastal.ca.gov. An appeal emailed to some other email address, including a different district's general email address or a staff email address, will be rejected. It is the appellant's responsibility to use the correct email address, and appellants are encouraged to contact Commission staff with any questions. For more information, see the Commission's [contact page](#) at <https://coastal.ca.gov/contact/#/>.

EXHIBIT 1. APPEAL TO THE CALIFORNIA COASTAL COMMISSION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS ACTION IN RE CASE#2019-0024 (CALTRANS DISTRICT 1, "NAVARRO RIDGE" HIGHWAY 1 ROAD FACILITY AND DRAINAGE SYSTEM EXPANSION).

Appeal of local CDP decision
Page 2

1. Appellant information¹

Name: ALBION BRIDGE STEWARDS & 11 CO-APPELLANTS (Exhibit 2)
Mailing address: P.O. BOX 363, ALBION, CALIFORNIA 95410
Phone number: 1-707-937-5575
Email address: jim@heidsite.com

How did you participate in the local CDP application and decision-making process?

☒ Did not participate * ☒ Submitted comment ** ☒ Testified at hearing *** ☐ Other

Describe: * Co-Appellant Patterson was unable to participate in the Board of Supervisors' proceedings on Case# CDP 2019-0024 because it failed to give him due notice. ** The Albion Bridge Stewards and specified Co-Appellants submitted written comments to the CPA and, on appeal, to the Board in opposition to the CPA's actions and CDP 2019-0024. *** The Albion Bridge Stewards and specified Co-Appellants presented oral testimony in the CPA's and, on appeal, the Board's proceedings. See Exhibit 2.

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: Co-Appellant Patterson appeared by written and oral comments in the CPA's proceedings on Case# 2019-0024, but for failure of the Board's giving him due notice of its proceedings was unable to participate in it.

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe (1) The Albion Bridge Stewards and Co-Appellants Hansen, Elac, Heid, Heil, Reiss, DeSmidt, Weibel, and van Zee timely appealed the CDP's actions to the Board of Supervisors. (2) Mendocino County charged us a \$1,616 appeal fee. We have thereby exhausted the LCP CDP appeal process at the local level. (LCP CZO §§ 20.536.015, 20.544.015.)

¹ If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.

Appeal of local CDP decision
Page 3

2. Local CDP decision being appealed2

Local government name:	County of Mendocino
Local government approval body:	Board of Supervisors (on appeal from CPA)
Local government CDP application number:	Case# CDP2019-0024
Local government CDP decision:	<input type="checkbox"/> CDP approval <input type="checkbox"/> CDP denial ₃
Date of local government CDP decision:	CPA CDP conditional approval, Nov. 17, 2021; affirmed by Board on appeal, Apr. 5, 2022.

Please identify the location and description of the development that was approved or denied by the local government.

[illegible]

z Attach additional sheets as necessary to fully describe the local government CDP decision, including a description of the development that was the subject of the CDP application and decision.

² Very few local CDP denials are appealable, and those that are also require submittal of an appeal fee. Please see the [appeal information sheet](#) for more information.

Appeal of local CDP decision
Page 5

5. Identification of interested persons See Exhibit 5.

On a separate page, please provide the names and contact information (i.e., mailing and email addresses) of all persons whom you know to be interested in the local CDP decision and/or the approved or denied development (e.g., other persons who participated in the local CDP application and decision making process, etc.), and check this box to acknowledge that you have done so.

☒ Interested persons identified and provided on a separate attached sheet

6. Appellant certifications

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name BILL HEIL By authorized electronic printed name _____

Bill Heil By authorized electronic signature _____
Signature

Date of Signature April 25, 2022

Exhibit 6 contains the authorized electronic signatures of the Co-Appellants

7. Representative authorization⁵

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

☐ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

⁵ If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

⁶ If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400

**DISCLOSURE OF REPRESENTATIVES**

If you intend to have anyone communicate on your behalf to the California Coastal Commission, individual Commissioners, and/or Commission staff regarding your coastal development permit (CDP) application (including if your project has been appealed to the Commission from a local government decision) or your appeal, then you are required to identify the name and contact information for all such persons prior to any such communication occurring (see Public Resources Code, Section 30319). The law provides that failure to comply with this disclosure requirement prior to the time that a communication occurs is a misdemeanor that is punishable by a fine or imprisonment and may lead to denial of an application or rejection of an appeal.

To meet this important disclosure requirement, please list below all representatives who will communicate on your behalf or on the behalf of your business and submit the list to the appropriate Commission office. This list could include a wide variety of people such as attorneys, architects, biologists, engineers, etc. If you identify more than one such representative, please identify a lead representative for ease of coordination and communication. You must submit an updated list anytime your list of representatives changes. You must submit the disclosure list before any communication by your representative to the Commission or staff occurs.

Your Name _____

CDP Application or Appeal Number _____

Lead Representative

Name _____

Title _____

Street Address. _____

City _____

State, Zip _____

Email Address _____

Daytime Phone _____

Your Signature _____

Date of Signature _____

Additional Representatives (as necessary)

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Your Signature _____

Date of Signature _____

EXHIBIT 2.1: LIST OF CO-APPELLANTS

Maria Hansen (Testified at CPA and BOS hearings by representative Norbert Dall)
Miguel Elac
PO Box 326
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Jim Heid (Testified at CPA and BOS hearings)
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Bill Heil
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Arlene Reiss
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Warren DeSmidt
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Annemarie Weibel (Testified at CPA and BOS hearings)
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yourali747@gmail.com


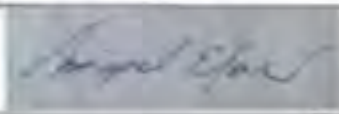
Janet Eklund (Testified at BOS hearing)
PO Box 186
Albion, California 95410
eklundmuseum1910@peoplepc.com

Tom Wodetzki (Testified at BOS hearing)
31901 Middle Ridge Road
Albion, California 95410
tw@mcn.org

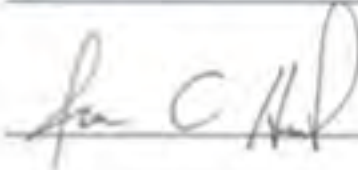
Jacob Patterson, Esq. (Testified at CPA hearing; received no notice of BOS hearing)
P.O. Box 2814
Fort Bragg, CA 95437
jacob.patterson.esq@gmail.com

EXHIBIT 6. AUTHORIZED ELECTRONIC SIGNATURES OF CO-APPELLANTS

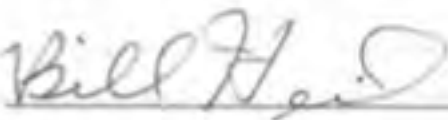
MARIA HANSEN
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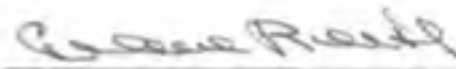
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Tom Hodelstein, 11000 Middle Ridge Road, Albion, CA 95410



Janet Eklund
P.O. Box 186, Albion, California 95410



Jacob Patterson
PO Box 2814
Fort Bragg, California 95437

EXHIBIT 2. Appellant Participation

1. The Albion Bridge Stewards and Co-Appellants Maria Hansen, Miguel Elac, Jim Heid, Bill Heil, Arlene Reiss, Warren DeSmidt, Annemarie Weibel, Ali van Zee, and Tom Wodetzki participated in the CPA proceedings re Case# CDP2019-0024, and the Board of Supervisors proceedings on appeal re Case# CDP2019-0024 by the following written testimony:

Initial combined comment letter to Mendocino County Coastal Permit Administrator (CPA) Gonzales re CPA Special Meeting Items 2 [Notice], 3b [Case# CDP2019-24], 3c [related Case# CDP2019-34], Nov. 16, 2021, 13 pp.

Appeal to the Mendocino County Board of Supervisors of CPA decision re CDP 2019-0024, Nov. 29, 2021, 48 pp.

Letter to the Mendocino County Board of Supervisors re Appeals of CDP 2019-24 and CDP 2019-34, Mar. 31, 2021, 9 pp.

Letter to the Mendocino County Board of Supervisors re Appeals of CDP 2019-24 and CDP 2019-34, Incomplete Noticing, Apr. 4, 2022, 11 pp.

2. The Albion Bridge Stewards and Co-Appellants Maria Hansen, Miguel Elac, Jim Heid, Bill Heil, Arlene Reiss, Warren DeSmidt, Annemarie Weibel, and Ali van Zee also participated in the Board of Supervisors proceedings on appeal re Case# CDP2019-0024 by their Letter to the Mendocino County Board of Supervisors re Response to the PBS Staff Report on the Appeal of the CPA Actions on CDP 2019-0024, Apr. 5, 2022, 13 pp.

3. Co-Appellants Hansen and Elac also participated in the CPA and Board of Supervisors proceedings re Case# CDP2019-0024 by oral testimony of their representative, Norbert H. Dall, on Board April 5, 2022 meeting agenda item 4(h) [The Board's video of its April 5, 2022 proceedings are posted at: https://mendocino.granicus.com/MediaPlayer.php?view_id=2&clip_id=284].

4. Co-Appellant Jim Heid also participated in the CPA proceedings re Case# CDP2019-0024 by written testimony (email of 11:26 am, 11/16/2021) and in the Board of Supervisors proceedings re Case# CDP2019-0024 by oral testimony on Board item 4(h).

5. Co-Appellant Annemarie Weibel also participated in the CPA and Board of Supervisors proceedings re Case# CDP2019-0024 by written testimony (respectively, email of 4:52 pm, 11/16/2021 and email of 5:40 pm, 4/5/2022) and by oral testimony on Board item 4(h).

6. Co-Appellant Tom Wodetzki also participated in the Board of Supervisors proceedings re Case# CDP2019-0024 by oral testimony on Board item 4(h).

7. Co-Appellant Janet Eklund participated in the Board of Supervisors proceedings re Case# CDP2019-0024 by written testimony (email at 5:48 pm, 4/5/2022) and by oral testimony on Board item 4(h).

8. Co-Appellant Jacob Patterson participated in the CPA proceedings re Case# CDP2019-0024 by written testimony (email of 10:29 am, 11/17/2021) and oral testimony, but because of the Board's failure to notify him of the Board's hearing on the appeals from the CPA's actions on Case# CDP2019-0024, was unable to appear in the proceedings on Board item 4(h).

Appeal by the Albion Bridge Stewards and 11 Co-Appellants to the California Coastal Commission of the Mendocino County Board of Supervisors Action on Case# CDP2019-0024, April 5, 2022.

Exhibit 3. Development Location and Description, Appeal to the California Coastal Commission of the “affirmation” action by the Mendocino County Board of Supervisors in Case# 2019-0024

“Navarro Ridge Safety Project” Development Location.

The Development Location on the Disclosed Record. On the disclosed record of Case# 2019-0024,¹ the proposed “Navarro Ridge Safety” development project is located in the coastal zone in the unincorporated County of Mendocino (County), and in and on all of the following significant coastal resource and related topographic, land use, zoning, and divided land areas:

(a) In the magnificent, awe-inspiring, and LCP-designated and mapped “highly scenic” gateway from inland California via Highways 101, 128, and 1 to the Mendocino Coast above the Navarro River Estuary, where - as further discussed in this appeal - development shall be subordinate to the character of the setting (LCP LUP Policy 3.5-3) and consistent with all other mandatory LCP and Coastal Act requirements;

(b) on the State-authorized and -funded Navarro Point Preserve open space, including variously within it on Navarro Cliff ESHA, rare Coastal prairie ESHA, wetlands and associated surface and subsurface waterways ESHA, sensitive avian species ESHA (including through removal of 75 trees that serve as perches for raptors), the regional Navarro Ridge-Navarro Point Preserve wildlife corridor ESHA, and traditional lateral/vertical highly scenic public trails on the 1st (lowest) uplifted marine terrace that are part of the California Coastal Trail;

(c) on six new parcels -- that consist of west-facing Navarro Ridge natural landform open space slopes, sensitive avian and faunal species ESHA, regional wildlife corridor ESHA, wetland ESHA, and associated surface and subsurface waterways -- that were recently fabricated by other divisions of land (without the required CDP’s for such development in the coastal zone²) from Mendocino County APN 123-310-16, APN 123-310-15, APN 123-310-07, APN 123-10-06, APN 123-310-14, and APN 123-310-13 by the California Department of Transportation, pursuant to eminent domain authorizations by the California Transportation Commission, to (as further discussed below) in relevant parts acquire the existing and an expanded Highway 1 right-of-way

¹ Board of Supervisors Resolution 22-086, by which the Board on appeal “affirmed” (upheld) the prior actions of the County Coastal Permit Administrator (CPA) on Case # CDP2019-0024, references “the whole record”, but fails to list its contents or even reference to a list of them. Although requested by us to do so, both the Board and the CPA failed to produce a list of all documents in the record of Case# CDP2019-0024, and thereby denied appellants and the public due process of law.

² LCP Coastal Zoning Ordinance (CZO) §20.308.035(D) specifically includes other land divisions in the coastal zone, as here, among the types of coastal program regulatory development that requires a CDP pursuant to CZO §20.532.010 in addition to any other permit or discretionary approval required by any local agency, special district, or any State or Federal agency as authorized by law or ordinance.

and >14,000 cubic yards of Navarro Ridge natural landform rock outcroppings, soils, and bedrock for excavation to heights of up to 52 feet above the extant roadway for use as fill (1) to extend the road prism onto the Navarro Point Preserve, and (2) at one or more undisclosed other locations (i.e., an acquisition by a public agency not for public recreational purposes);

(d) in and on the extant two-lane rural Highway 1 road prism between (Mendocino County) post miles 41.78 and 42.3 that follows the contoured topography near the base of Navarro Ridge, and is subordinate to them;

(e) between Highway 1 (Mendocino County) post mile 41.1 and post mile 42.9,³ and therefore (from south to north) in the LCP-designated and mapped RR-5, RMR-40, RR-5-PD, and RL land use and zoning districts. Specifically, LCP Land Use Map 19 depicts: (1) the RR-5 and RMR-40 land use districts to extend to the landward side of the shown Highway 1 roadway; (2) the RR-5-PD land use district to extend (A) east from the RMR-40 land use district south and to ± 900 feet north of east-west trending Navarro Ridge Road, and (B) north from the RMR-40 land use district west and northwest of shown Highway 1 and its intersection with said Navarro Ridge Road; and (3) the RL land use district to extend west of shown Highway 1 and the shown turnout northwest of said intersection. Neither LCP Land Use Map 19 nor Zoning Map 55 designates and maps a “right of way” (ROW) land use or zoning district. In relevant parts, as further discussed below, CDT1 proposes development project excavation and fill grading in the RMR-40, RR-5-PD, and RL land use districts; development project construction in the RMR-40 and RR-5-PD land use districts; and other development project work in the RR-5, RMR-40, RR-5-PD, and RL land use districts. In addition (as also further discussed below), the development project implicates direct, indirect, and cumulative changes in the use of land and access thereto in the RR-5, RMR-40, RR-5-PD, and RL land use districts, in the use of water and access thereto in the RR-5, RMR-40, RR-5-PD, and RL land use districts, and the other division of land for CDT1-identified highway purposes (rather than for acquisition for recreation purposes) on seven parcels in the RR-5-PD land use district;

(f) on three staging areas, respectively at Highway 1 post miles 42.37-42.39 (southerly of the Highway 1-Navarro Ridge Road reduced visibility intersection), 42.39-42.42 (northerly of the Highway 1-Navarro Ridge Road reduced visibility intersection), 42.44-42.48 (northwesterly of the Highway 1-Navarro Ridge Road reduced visibility intersection), that constitute Highway 1 turnouts;⁴

³ The 01-0C550 Plan Set, Sheet 1 of 45, dated 0-06-20, contains the development project location map, with the project engineer’s stamp, that identifies the north-south extent of project development (termed, respectively, “construction” and “work”). Other sheets (e.g., that depict project components in section view) disclose some, but not all, of the locations of project development along its east-west axis.

⁴ Post mile data is from the Caltrans PostmileServices web site, at: <https://postmile.dot.ca.gov/PMQT/PostmileQueryTool.html?> (most recently accessed on April 24, 2022).

(g) on a driveway staging area easterly of the Highway 1 road prism near post mile 41.87, and on the possible driveway staging area (variously identified as “Nonella Lane” southerly of east-west trending Navarro Ridge Road, and/or as having Navarro Ridge Road street addresses) on the uplifted (2nd Pleistocene) marine terrace that comprises westerly Navarro Ridge, for mechanized excavation and transport equipment access to the west-facing designated highly scenic Navarro Ridge slopes;

(h) on the LCP land use map 19 (Navarro)-designated turnout, westerly of the extant Highway 1 roadway, at post mile 41.78;⁵

(i) on one or more currently undisclosed fill or dump sites from 73% of the (unbalanced, 28,150 cy) excavation of rock outcrops, soils, and sandstone that comprise the Navarro Ridge natural landform;

(j) on areas where Caltrans District 1 has performed development outside the pre-1973/ pre-1977 Highway 1 road prism without the required CDP's, including, but not limited to, (1) removal of trees beyond the westerly edge of the road prism in the development project area, (2) placement of solid materials from improperly maintained and failed drainage infrastructure on the down-worn (eroded by concentrated water discharges from the road prism) 1st marine terrace and Navarro Cliff seaward of Highway 1 post mile 42.11, (3) excavation and destabilization of the Navarro Ridge natural landform, (4) discharge and placement of fill on Navarro Point Preserve, (5) discharge of polluted water to the Navarro Point Preserve at the outfalls from nine drainage structures, and (6) associated changes in the intensity of use of land and water, and access thereto, and the aforementioned other divisions of land; and,

(k) the whole CTD1 Highway 1 development project in Albion, which extends by this piecemealed component and others for nearly four miles between the intersection of Highways 1 and 128 at the Navarro River and Dark Gulch, is located on the RR-5-DL,
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⁵ LCP Land Use Map 19 is posted at: <https://www.mendocinocounty.org/home/showpublisheddocument/7044/636295844734670000> .

RMR-20, RR-5, RMR-40, RR-5-PD, RL, RR-10, RR-2, C, RV, FV, and OS land use districts.⁶

“Navarro Ridge Safety Project” Development Description.

1. No Pending CDP Application Contained the “Navarro Ridge Safety Project” Development Description on November 17, 2021. The disclosed record in Case# CDP 2019-0024 reveals that CTD1 has submitted no settled (“finite”, PBS-stamped “Received”) development description to PBS for the “Navarro Ridge Safety Project” since the original incomplete CDP application submittal that PBS received on July 1, 2019. That application remained incomplete at the one year deadline in 2020 for CTD1 to make it complete, and pursuant to the clear terms of CZO §20.532.035(F) it was deemed withdrawn.⁷ Thus, no valid development description in Case# 2019-0024 was in PBS’s possession on November 17, 2021, and the CPA’s action to conditionally approve some CDP application 2019-0024 altogether lacked the necessary accurate, complete, and internally consistent CDP application form and proposed development description, including maps, plans, and other relevant data of the project site and vicinity

⁶ The whole project location includes (from south to north) 1. the Navarro Grade cantilvered turnouts and guardrails; 2. unpermitted major vegetation removal, grading, discharge of solid materials, changes in the public trail access to land, changes in the intensity of use and discharge of water, erosion from unmaintained development of Navarro Cliff and the 1st marine terrace on the Navarro Point Preserve; 3. grading and associated destabilization of the west-facing Navarro Ridge natural land form ESHA; 4. the full subject Navarro Ridge 0C550 development project; 5. the overlapping Navarro Creek-Highway 1 expansion and drainage project; 6. the continuing violation from unpermitted (regular CDP) culverting of Navarro Creek in and after 1998; 7. the realignment and expansion of Highway 1 from south of its intersection with west-trending Navarro Ridge Road to the south approach to the Salmon Creek Bridge; 8. the continuing violation from unpermitted lead paint sandblast waste discharge to the Salmon Creek Estuary, lower Salmon Creek Valley, Salmon Creek bluffs, Whitesboro Cove coastal bluffs, public Whitesboro Cove beach, designated Whitesboro Cove beach public access way (including, but not limited to, on Spring Grove Road and between it and the MHTL in Whitesboro Cove); 9. unpermitted major vegetation removal and cut and fill grading on Whitesboro Cove coastal bluff, south-facing Salmon Creek bluff, a tributary to Little Salmon Creek, north-facing salmon Creek bluff, and in lower Salmon Creek Valley associated with road development to support mechanized equipment access for Salmon Creek Bridge replacement geotechnical investigations and clearing of the planned future Salmon Creek Bridge replacement construction/access envelope; 10. removal of riparian and wetland ESHA, excavation of wetland soils, and fill with imported other earthen materials of lead-zinc contaminated areas in the planned future Salmon Creek Bridge replacement construction/access envelope; 11. realignment, grading, and widening of the Highway 1 road prism between near its intersection with Spring Grove Road and the proposed replaced Salmon Creek Bridge; 12. continued failure to sustainably maintain the iconic and state- and federally-listed historic(al) timber-steel Albion River Bridge, with proposed replacement by a substantially widened, accelerated, and straightened out-of-context concrete bridge, mass excavation grading of the Albion River bluffs and the Albion Cove coastal bluff ESHA, and preemption of high priority traditional Albion fishing village commercial visitor-serving recreational uses and the public Albion Cove beach; 13. surface and subsurface Highway 1 road berm drainage facility expansions and relocations, with direct, indirect, and cumulative impacts on the use and conditions of land and water; and 14. unpermitted expansion, by major vegetation removal, excavation and fill grading, of the Highway 1 road berm and construction of an adjacent large staging area-turnout at Dark Gulch. See, LCP Land Use Map 19 (op. cit.) and LCP Land Use Map 18, Albion, posted at: <https://www.mendocinocounty.org/home/showpublisheddocument/7042/636295844192930000> .

⁷ The automatic deemed withdrawal pursuant to CZO §20.532.035(F) is separate from the applicant’s affirmative ability to withdraw a CDP application set forth in CZO §20.532.050(E).

in sufficient detail, to (a) determine whether the project complies with the requirements of the CZO, LUP, and Coastal Act, and (b) make the required applicable findings. (CZO §§20.532.025, 20.532.025(A), 20.532.050, 20.532.095, 20.532.100.) As a result, as the Albion Bridge Stewards and Co-Appellants stated on appeal of Case# 2019-0024 to the Board, there was no CDP application before the CPA that he could act to conditionally approve, and his action (decision) was *ultra vires* and void from the start.

2. The Mirage “Navarro Ridge Safety Project” Development Description by PBS.

Instead, the PBS Coastal Permit Administrator Staff Report - Standard CDP - CDP_2019-0024 (November 17, 2021, the “PBS CPA Report” merely states CTD1’s (or its agent, Frank Demling’s) “request” for a “Standard Coastal Development Permit to make safety improvements and perform rehabilitation on State Route (SR) 1 from post mile (PM) 41.78 to PM 42.3. The project proposes to widen the existing lanes to 12 feet each, widen the existing shoulders in both directions to 4 feet, install a Midwest Guardrail System (MGS) treated with light-brown stain, improve the superelevation, reestablish the drainage facilities and 6-foot box culvert for wildlife passage, replace the centerline rumble strip, and remove up to 75 trees(, w)ithin the Coastal Zone along SR1 just south of its intersection with Navarro Ridge Road (County Road 518), between postmiles 41.78 and 42.3. Staging is proposed at postmile 42.4.”⁸ Notably, neither the text nor Attachments A-T and Exhibits A-D contain a CDP application form, a finite (stamped “Received”, or even unstamped) development description, or any CDT1 written request for a “Standard CDP”.

However, the PBS CPA Report at 50-62/71 contains a “Navarro Ridge Safety Project Description and Summary”, dated October, 2021, that (1) on its face presents a proposed development project that differs substantially from that described in the original (withdrawn) application for CDP 2019-0024, (2) constitutes a disguised new CDP application, for which CTD1 has not submitted (a) the required internally consistent, accurate, and complete CDP application to PBS, (b) current data and an environmental document that analyzes it, (c) the current list of owners of fee and less than fee interest in property that is affected by the development project to whom the LCP requires the CPA to give notice at the point of CDP application, and (d) the current list of occupants, and known interested persons to whom the LCP required the CPA to give notice of public hearing on an officially filed (post application review) CDP application. As a result, even if (*arguendo*) this Navarro Ridge Safety Project Description and Summary” were to somehow constitute an amended CDP application (after it was deemed withdrawn), it was on its face incomplete and therefore incapable of being filed for processing and hearing before the CPA.

In sequence, the “Navarro Ridge Safety Project Description and Summary”, dated October, 2021, discloses 17 identifiable development project components and omits disclosure, in whole or part, of 68 specific other development project components, the latter of which the CPA therefore would not have had before him for action in any event. The following list enumerates the 17 identifiable development project components:

⁸ PBS CPA Report, reproduced in PBS Board Memo, April 5, 2022, at 68/178.

1. Highway 1 development project between PM 41.78 and PM 42.3 (exclusive of the Highway 1 development project between (a) PM 40.8 and PM 41.78, and (b) PM 42.3 and PM 42.9; development in the LCP-designated highly scenic areas of Navarro Ridge and the Navarro Point Preserve); and substantial increase in right of way and road berm width, cut Navarro Ridge natural landform, creation by other division of land of six new parcels entirely within ESHA buffers).
2. Lane widening to 12 feet (exclusive of the relocation of both northbound and southbound lanes on substantial new fill on the widened road prism, straightening of the northbound lane by impermissible excavation of protected Navarro Ridge natural landforms and ESHA, straightening of the southbound lane by impermissible fill of Navarro Point Preserve ESHA).
3. Widening of existing shoulders to 4-feet (exclusive of new shoulders where none now exist).
4. Installation of light-brown stained "Midwest" guardrail horizontal and vertical structures (exclusive of specified locations and omission of a guard rail along the proposed new 4-foot wide drainage ditch excavated from Navarro Ridge earthen materials).
5. Improve roadway superelevation (exclusive of specified and omitted locations).
6. Reestablish the drainage facilities (exclusive of new, enlarged capacity/throughput, or extended drainage facilities, but inclusive of unpermitted drainage facilities that extend beyond the pre-1973 road berm).
7. Reestablish the 6-foot box culvert for wildlife passage (exclusive of any extension, new wing walls, utilization of rocks as energy dissipators, fencing, baseline biological inventory and feasibility analysis).
8. Replace the centerline rumble strip (but no new edge line rumble strips).
9. Remove "approximately" 75 trees, to accomodate road widening and construction access (almost exclusively as functional sensitive avian species ESHA on Navarro Point Preserve, inclusive of previous unpermitted tree removal disclosed in the 2017 Natural Environmental Study).
10. Excavation of 14,075 cubic yards (from the Navarro Ridge natural landform, exclusive of the required complete subsurface geotechnical investigation, a site-specific grading plan, identification of the potential staging area and haul route on the Nonella Lane (aka Navarro Ridge Road) driveway on westerly Navarro Ridge uplands).
11. Utilization of 3,858 cubic yards of the excavated material for fill to extend the shoulder on the west side of the road (exclusive of utilization of the excavated material for new shoulder and road prism construction, the required complete subsurface

geotechnical investigation, a site-specific grading plan, identification of the potential haul route(s) between Navarro Ridge and the proposed Navarro Point Preserve fill envelopes).

12. Export of 10,217 cubic yards of the excavated material, proposed for subsequent approval (exclusive of a pending CDP application, one or more identified receiver (disposal) site(s) and associated haul routes).

13. Identified staging areas, at approximately PM 42.4, within existing pullouts on the west and east side of Highway 1 (exclusive of proposed/potential staging areas in the easterly trending driveway near post mile 41.8, on the Nonella Lane (aka Navarro Ridge Road) driveway on westerly Navarro Ridge uplands, and the public safety values of two of these turnouts for line of sight at the T-intersection of Highway 1 and Navarro Ridge Road).

14. Best management practices (BMP's) during construction (exclusive of an enforceable mitigation monitoring and reporting program).

15. The total project disturbed area "would be 4.73 acres", with 2.16 acres of impervious areas (apparently based on a horizontal rather than warped plane area calculation, exclusive of direct, indirect, and cumulative significant impacts from Navarro Ridge slope excavation on unstable adjacent (upslope, side-slope) topography, concentrated discharges of polluted road runoff to Navarro Point Preserve watercourses, wetlands, Coastal prairie, and Navarro Cliff sensitive raptor nesting ESHA near post mile 42.11).

16. Unspecified ESHAs would be bounded by THVF (high visibility fencing) to indicate areas that are off-limits to the contractor (exclusive of an enforceable mitigation monitoring and reporting program).

17. Traffic control measures would keep a minimum 12 feet of paved roadway open for public traffic (unsupported by a current Traffic Management Plan and contrary to the 2017 Traffic Management Plan that was part of the original CDP application).⁹

⁹ The Albion Bridge Stewards and Co-Appellants of the CPA action on Case# 2019-0024 incorporate their additional project description and description omission analysis in the (November 29, 2021) appeal to the Board of Supervisors, and our subsequent letters to the Board of April 1, 2022, April 4, 2022, and April 5, 2022, herein by reference.

EXHIBIT 4. Substantial issue grounds for appeal of the action by the Mendocino County Board of Supervisors to “affirm” the actions of the Mendocino County Coastal Permit Administrator to conditionally approve development in re Case# 2019-0024.

1. No Valid Pending CDP Application. No valid pending CDP application existed either on April 5, 2022, when the Board acted to “affirm” the CPA’s action to conditionally approve “CDP 2019-0024”, or on November 17, 2021, when he rendered his decision. PBS in the PBS Board Memo at 2-3 and in oral testimony by its Director has admitted in the proceedings before the Board on appeal in this matter that the CTD1 CDP application for the “Navarro Ridge Safety Project” was incomplete at the one year deadline for making it complete, and, in fact, for over 11 months thereafter. The CDP application was therefore automatically deemed withdrawn in July, 2020. (CZO §20.532.035(F)). CTD1 did not contest the PBS determination of CDP application incompleteness by filing an administrative appeal for it during 2019-2020, did not challenge the deemed withdrawal of the incomplete application in 2020, and did not avail itself of the ability to file a new (required complete) application for the “Navarro Ridge Safety Project” in 2020-2021.

Thus, no actionable CDP application for it was before the Board on April 5, 2022 (or the CPA on November 17, 2021), the LCP delegates no plenary authority to PBS to craft an alternative CDP application processing methodology that resurrects or keeps on life support an incomplete CDP application after the strict one year deadline established by CZO §20.532.035(F) for making a CDP application complete, and the CPA and Board in turns acted *ultra vires* and inconsistent with the plain terms of the LCP.

2. Erroneous County Threshold Decision-Maker. CZO §20.532.035(D) requires that “(d)uring application check, the department shall determine the type of permit for which application has been made”. The development project proposed in the CDP application is in the LCP RMR-40, RR-5-PD, and RL land use and zoning districts, in which a highway development project, as here, does not constitute a principal permitted use. The PBS Board Report’s reference, at 68/178, to the “Navarro Ridge Safety Project” being in a right-of-way (ROW) land use and/or zoning district is pretense - no such district exists in the certified LCP. The produced record of the County proceedings on Case# 2019-0024 contains no written evidence of any analysis or findings by PBS that the CDP application (if, *arguendo*, it were complete, which it at no time since July 1, 2019 has been) that CTD1 applied for, or that the application qualifies for, a “Standard Coastal Development Permit” that is subject to CPA review, evaluation, and action, rather than a Conditional Use and land division CDP that is subject to Planning Commission review, evaluation, and action. (CZO §§20.532.045(B), 20.532.045(C).) The CPA’s action on the application for CDP 2019-0024 is therefore in excess of, and inconsistent with, the decision-making authority vested by the LCP in the County Planning Commission, and *ultra vires*. Moreover, the disclosed whole record does not support the PBS Board Report’s assertion, at 68/178, that “CTD1 requests a Standard Coastal Development Permit” for the subject development project, which left the Board without a valid CPA action to uphold on appeal.

3. Failure to Provide Required Notice Lists and Due Notice. CTD1 in its incomplete CDP application, and at all times during the course of Case# 2019-0024 within the County government, failed to inform PBS of the list of, and notice materials to, all owners of real property within the LCP CDP hearing notice radius, any occupants of real property within the LCP CDP hearing notice radius, or any of the many persons known by CTD1 and specifically its project manager, Frank Demling, to be interested in Highway 1 development projects in Albion, inconsistent with the respective requirement therefor in CZO §§20.532.025(D), 20.532.025(E), and 20.532.025(F). In tandem, as the PBS Director admitted at hearing before the Board and we document in our appeal to it, neither the CPA nor the Board (acting through its Clerk) gave notice to the many of real property owners, any occupants on such property, and the many known interested persons who by prior correspondence with the project manager had effectively requested to be notified of all hearings on such Highway 1 development projects.¹

The CPA's and Board's failure to provide due notice to the class of property owners, occupants, and interested persons known to the applicant denied them the information to understand and be able to participate in the respective CPA and Board proceedings, and thus their due process rights, inconsistent with the notice requirements of CZO §20.532.025, the Board's conformed implementation purpose of the LCP with the Coastal Act in CZO §20.304.170(B), and the public's right to maximized opportunities for understanding and participation in the coastal development regulatory program.

4. Development Project Inconsistencies with the LCP and Coastal Act.

4.1. For lack of a valid pending CDP application for the "Navarro Ridge Safety Project" before the CPA in 2021 and before Board in 2022, the proposed development by CDT1 in its rampantly incomplete, superannuated, internally inconsistent, and variously inaccurate 2019 CDP application materials is inconsistent with the specified content (information) requirements of CZO §20.532.025(A), which in turn has in relevant parts precluded the required determination, on the chain of substantial evidence, analysis, and findings, whether the development project complies with the requirements of the LCP and Coastal Act, inconsistent with the CDP regulatory development procedures in CZO §§20.532.50, 20.532.095, 20.532.100, and 20.536.015(E).

4.2. Development Project Inconsistencies with the Land Use Plan.

4.2.1. LUP Policy 3.5-1 requires that State Highway 1 in rural areas of the Mendocino County coastal zone shall remain a scenic two-lane road and, further, that permitted development shall be sited and designed to protect views to and along scenic coastal areas, minimize natural landform alteration, and be subordinate in designated highly scenic areas to the character of its setting. *First*, the Project development envelope is

¹ We incorporate our appeal of the CPA's action on Case# 2019-0024 to the Board, our related correspondence to the Board of April 1, 2022, April 4, 2022, and April 5, 2022, and our oral testimony at the Board and CPA hearings, herein by reference.

located in the rural coastal zone, outside the nearest urban/rural boundary. *Second*, the Project is located in the LCP-designated and mapped Highly Scenic Area that encompasses the westerly facing Navarro Ridge slopes and the entire Navarro Point Preserve. *Third*, Highway 1 in its current alignment generally conforms to the curved natural landform contours of the west-facing Navarro Ridge slopes, and as such functions as the scenic two lane road that LUP Policy 3.5-1 protects. However, CTD1 proposes to (a) excavate and compact most of the 2,000 foot long Navarro Ridge natural landform - variously up to (what is now represented by merely typical (not site-specific) cross sections) up to a vertical height of 52 feet above the proposed elevated roadway, (b) straighten the existing contoured roadway, and (c) enlarge the road prism by a series of manufactured fills and slopes into the Navarro Point Preserve that would be highly visible from the highway, going upcoast and downcoast, and from Navarro Point Preserve and the California Coastal Trail, looking landward. *Fourth*, the unsupported (by the required geotechnical investigation report, or by a comprehensive alternatives analysis that would substantially reduce and balance Project grading volumes, as the representatives of one property owner outlined to CTD1 staff) and proposed unbalanced Project cut and fill grading does not minimize the alteration of either the Navarro Ridge or Navarro Point Preserve natural landforms. *Fifth*, neither the proposed Project excavation nor the road prism fill onto Navarro Point Preserve would be subordinate to the designated highly scenic area, but rather stand in sharp contrast to it. Moreover, monitoring by the Albion Bridge Stewards of other recent CTD1 "revegetation plan" projects along Highway 1 in Albion indicates a repeated history of CTD1 non-performance and failed, out of plan, implementation that, absent a much more rigorous and fully transparent (quantitative) set of performance criteria, preparation of planting areas, selection of compatible *in situ* native species, continuing regular weeding, and regular (short interval, specifically accountable) monitoring, reporting and adaptive management, would likely continue and thereby not even restore the native vegetation on the manufactured slopes.

This out-of-context Project is simply inconsistent with the scenic road, highly scenic setting, and natural landform protection standards of LUP Policy 3.5-1, and thus failed to support the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.2. LUP Policy 3.5-2 specifically requires that new development in Albion shall protect the community by remaining within the scope and character of existing development, consistent the CZO and other implementing ordinances. *First*, the scope and character of the Project (including, but not limited to, grading, alteration of Navarro Ridge and Navarro Preserve natural landforms, development that follows natural landform contours, straightening of the roadway, widened road shoulders, are substantially outside - rather than within - the scope and character of existing development in the Project area of South Albion. *Second*, as discussed *infra*, the Project is inconsistent with numerous mandatory CZO conservation and development standards.

The Project is destructive, rather than protective, of the environmental and community setting of Albion, and thus failed to support the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.3. LUP Policy 3.5-3 lists the LUP Map 19-designated Highly Scenic Area in the area of the Project development envelope - as mapped in the inset on Map 19 to include, from south to north, the RR5, RMR 20, RMR 40, RR 5 PD land use designation areas easterly of Highway 1, and RL land use designations, but not the RR5PD and RR 10 land use designations westerly of Highway 1, north of (unmarked) APN - as one in which (a) new development shall be subordinate to the character of its setting, (b) any development permitted in these areas shall provide for the protection of ocean and coastal views from public areas including highways, roads, coastal trails, vista points, beaches, parks, coastal streams, and waters used for recreational purposes, (c) new development should be subordinate to natural setting and minimize reflective surfaces, and (d) all proposed divisions of land and boundary line adjustments within "highly scenic areas" will be analyzed for consistency of potential future development with visual resource policies and shall not be allowed if development of resulting parcel(s) could not be consistent with visual policies. *First*, as discussed *infra*, the Project grading of the west-facing Navarro ridge slopes, road prism widening and drainage facility expansion onto the Navarro Point Preserve, and rock-drainage structure development on the CDT1-eroded upper Navarro Cliff west of Post Mile 42.1 are not subordinate to the character of its setting, and therefore are inconsistent with LUP Policy 3.5-3. *Second*, the Navarro Ridge slope grading, expanded drainage facilities and road prism into the Navarro Point Preserve, rock drainage structure west of Post Mile 42.1 are prominently both in the ocean and coastal viewshed from Highway 1, and in the coastal viewshed from the Navarro Point Reserve, looking landward, downcoast, and upcoast, inconsistent with LUP Policy 3.5-3. *Third*, the proposed straightened highway, with new shoulders and temporarily stained metal guardrails (until the stain is abraded), is not subordinate to the natural setting, but as CTD1's own photo-simulations show, rises above it to block views from passenger vehicles (rather than trucks) traveling along Highway 1 of the nearshore Pacific Ocean and to and along the Navarro Point Preserve, inconsistent with LUP Policy 3.5-3.² *Fourth*, CTD1's' (unpermitted) creation of Project parcels, without prior County CDP approval, on the west-facing Navarro Ridge slopes in the RR-5-PD land use designations constitutes a blatant attempt to circumvent the County's CDP regulatory authority and requirements, including here specifically with regard to visual quality protection, inconsistent with LUP Policy 3.5-3.

The superordinate CDT1-proposed development project is inconsistent with the Albion community setting the provisions of LUP Policy 3.5-3 that protect it, and thus failed to support the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

² If the whole record of the Board and CPA proceedings on Case# 2019-0024 does not include the referenced CTD1 drone aerial imagery, we will provide a copy to the Coastal Commission on request.

4.2.4. The development project envelope is located in, on, and/or (as applicable) adjacent to or within 100 feet to ± 500 feet of (a) the Navarro Point Preserve ESHA, where Albion Bridge Stewards and Co-Appellants have observed bobcats, foxes, deer, coyotes, black bears, possums, rabbits, and vultures, among other wildlife species; (b) Navarro Cliff ESHA, on which Albion Bridge Stewards, Co-Appellants, and Navarro Ridge residents have observed nesting and fledgling Peregrine falcons; (c) on the rare Coastal prairie ESHA in Navarro Point Preserve, where Albion Bridge Stewards and Co-Appellants have observed foraging Peregrine falcons, White-tailed kites, and Golden eagles; (d) the corridor of living and apparently dead Monterey pines, Bishop pines, and other tree species ESHA on the Navarro Point Preserve, where Albion Bridge Stewards and Co-Appellants have observed these sensitive avian species to perch; (e) relict cross-fencing ESHA on the Navarro Point Preserve and west-facing Navarro Ridge slopes, where Albion Bridge Stewards, Co-Appellants, and Navarro Ridge residents have observed these sensitive avian species to perch; (f) surface and shallow subsurface watercourse and associated freshwater wetland ESHA on Navarro Point Preserve; riparian and wetland ESHA in the landward extension of upper Navarro Cliff where CTD1's concentrated (and now failed) water discharge facility near post mile 42.11 has eroded the upper cliff and adjacent former marine terrace; (g) the Navarro Ridge ESHA, where Albion Bridge Stewards, Co-Appellants, and Navarro Ridge residents have observed foraging by the aforementioned sensitive raptor species and utilization of the wildlife corridor (evidenced by numerous animal trails on the west-facing Navarro Ridge natural landform slopes, to/from the Navarro Point Preserve) by the aforementioned terrestrial species; (h) Navarro Point Preserve and west-facing Navarro Ridge slopes, where we understand that recent botanical observations have identified the rare pygmy manzanita (*Arctostaphylos nummularia* ssp. *mendocinoensis*), Humboldt county milkvetch (*Astragalus acnicidus*), Point Reyes blennosperma (*Blennosperma nanum* var. *robustum*), coastal bluff morning glory (*Calystegia purpurata* ssp. *saxicola*), California Bluebells (*Campanula californica*), California sedge (*Carex californica*), livid sedge (*Carex livida*), deceiving sedge (*Carex saliniformis*), green-yellow sedge (*Carex viridula* ssp. *viridula*), Humboldt Bay owl's clover (*Castilleja ambigua* ssp. *humboltiensis*), Mendocino Indian paintbrush (*Castilleja mendocinensis*), Pt. Reyes ceanothus (*Ceanothus gloriosus* var. *gloriosus*), Whitney's farewell-to-spring (*Clarkia amoena* ssp. *whitneyi*), round-headed Chinese-houses (*Collinsia corymbosa*), goldthread (*Coptis laciniata*), bunchberry (*Cornus canadensis*), goldenthread (*Cuscuta pacifica* var. *pacifica*), supple daisy (*Erigeron supplex*), pacific gilia (pacific gilia), dark-eyed gilia (*Gilia millefoliata*), Hayfield tarweed (*Hemizonia congesta* ssp. *Congesta*), Tracy's tarweed (Tracy's tarweed), pygmy cypress (*Hesperocyperus pygmaea*), Pt. Reyes horkelia (*Horkelia marinensis*), thin-lobed horkelia (*Horkelia tenuiloba*), marsh pea (*Lathyrus palustris*), Coast lily (*Lilium maritimum*), Redwood lily (*Lilium rubescens*), running pine (*Lycopodium clavatum*), Wolf's evening primrose (Wolf's evening primrose), California broomrape (*Orobanche californica* ssp. *californica*), north coast phacelia (*Phacelia insularis* var. *continentalis*), long-bracted wintergreen (*Pyrola asarifolia* ssp. *bracteata*), white beaked-rush (white beaked-rush), Point Reyes checkerbloom (*Sidalcea calycosa* ssp. *rhizomata*), Siskiyou checkerbloom (*Sidalcea malvaeflora* ssp. *patula*), purple-stemmed checkerbloom (purple-stemmed checkerbloom), two-fork clover (*Trifolium amoenum*), and including numerous wetland (FAC, FACW, OBL,)

indicator species, as well as Indian paintbrush (*Castilleja subinclusa* ssp. *franciscana*, which may be rare). LUP Policy 3.1-2 requires development to avoid significant degradation of these ESHA's. Review of the biological studies on which the CPA and Board relied indicates them to be superannuated (not current) and variously geospatially incomplete (including through artificially limited field work areas that do not meet the geospatial habitat/resource identification requirements of CZO §20.532.060), and thus incapable of meeting the "existing situation" test for environmentally sensitive habitat occurrence established by LUP Policy 3.1-1.

The Project has potentially significant direct (e.g., grading and vegetation removal), indirect (e.g., hydromodification, siltation/sedimentation), and cumulative adverse effects on ESHA and ESHA buffers, lacks the current development component site- and parcel-specific biological investigation data required by the LUP, and thus failed to support the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.5. CTD1 proposes to (a) remove riparian vegetation ESH in the drainage near Post Mile 42.1, and (b) place structural fill and develop new structural drainage facilities in the ESH, without demonstration that *first*, the proposed development constitutes a use that is dependent on the riparian resources, and *second*, will protect them against significant disruption of habitat values, including, as applicable, through mitigation for any permitted riparian resource- dependent uses, inconsistent with the requirements therefor in LUP Policy 3.1-10.

The proposed Project removal of riparian vegetation and fill of the riparian area thus is inconsistent with LUP Policy 3.10 and failed to support the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.6. The CDP application proposes to fill and hydromodify multiple Project development envelope LCP/coastal program regulatory wetlands and the riparian area near Post Mile 42.1, with excavated earthen material from the Navarro Ridge natural landform that the LCP renders unavailable for such grading. *First*, CTD1' proposed fill and hydromodifications do not constitute an "incidental public service purpose", as that term occurs in LUP Policy 3.1-4, because the Project proposes not to maintain, inspect, or bury existing drainage pipes in wetlands, but rather develop new drainage facilities in them, or perform changes in the direction and volumes of discharged polluted runoff to downgradient wetlands and the riparian area. *Second*, the proposed fill and hydromodifications (a) are not in accordance with all other applicable provisions of the LUP (e.g., the prohibition of substantial natural land form alteration), and (b) fail to incorporate mitigation measures that (1) maintain or enhance the functional capacity of the wetland, (2) include, at a minimum, either acquisition of equivalent areas of equal or greater biological productivity or opening up equivalent areas to tidal action, or (3) provide for other mitigation measures consistent with LUP Policy 3.1-4. *Third*, the CDP application record contains no analysis of whether a feasible, less environmentally damaging, alternative to the proposed fill and hydromodification of LCP/coastal program regulatory wetlands and the riparian area exists, inconsistent with LUP Policy 3.1-4.

The proposed Project fill and hydromodifications of jurisdictional wetlands and the riparian area is inconsistent with LUP Policy 3.1-4 and failed to support the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.7. CTD1 has impermissibly removed (or caused to be removed by contractor(s), in whole or parts, some +15 trees from the Navarro Point Reserve, westerly of the pre-April, 2020 Highway 1 ROW and road prism, and ≥ 3 trees from east of that ROW/road prism, without application to, or issuance of, the requisite CDP by PBS, inconsistent with the requirement of LUP Policy 3.1-33 that removal of major vegetation for non-agricultural purposes constitutes regulatory development that requires prior issuance of a CDP, which shall be granted only when the proposed development is consistent with all other sections and policies of the LUP.

Unpermitted removal of trees in the Navarro Point Preserve sensitive species foraging ESHA and in the Navarro Ridge wildlife corridor ESHA by, or on behalf of, CTD1 thus precludes the CPA's and Board's findings of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.8. LUP Policy 3.4-1 requires the County to review all CDP applications to determine (a) threats from geologic hazards on development, (b) the threat of impacts from development on unstable geologic conditions, and (c) in areas of known or potential geologic hazards, require a geologic investigation and report, prior to development, to be prepared by a licensed engineering geologist or registered civil engineer with expertise in soils analysis. *First*, a CTD1 geotechnical engineer in 2020 recommended, following surficial geological observations of slope instability in the Project development envelope on west-facing Navarro Ridge and shallow soil auger borings along the edge of northbound Highway 1, that the site-specific geotechnical investigation/report be performed. *Second*, in response to the request of a property owner in the RR-5-PD land use area for the report, the CTD1 project manager who signed the CDP application and subsequently CTD1 counsel represented the report to exist (serially to CTD1 headquarters staff, the California Transportation Commission, and the property owner), but have failed to produce it. *Third*, the CTD1 CDP application (withdrawn in 2020) failed to include it. *Fourth*, although a member of the public called the attention of the former PBS Director and staff to that omission, PBS apparently did not require the geotechnical investigation report before the one-year clock ran on the incomplete CDP application and it was deemed by the CZO to be withdrawn. Given CTD1's own observed slope instability in Navarro Ridge areas that it proposes to excavate and in the immediate bluff top area seaward of Post Mile 42.1, the 20th Century slope failure adjacent to the easterly-trending driveway development near Post Mile 41.8, the presence of expansive soils in the Navarro Point Reserve, and deteriorated bluff edge conditions in the Reserve to which previous hydromodifications by CTD1 may likely be tributary, the lack of the LUP Policy 3.4-1-required geotechnical investigation report thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.9. LUP Policy 3.4-9 requires that any development landward of the blufftop setback shall be constructed so as to ensure that surface and subsurface drainage does not contribute to the erosion of the bluff face or to the instability of the bluff itself. *First*, CTD1 has failed to calculate the site-specific development setback requirement. *Second*, CTD1 has failed to present as part of the CDP application any geotechnical analysis, including, but not limited to, a cross-section (profile) of the proposed substantial rock fill structure in the upper bluff and/or adjacent narrow bluff top area westerly of Post Mile 42.1 that provides for construction of the fill and new drainage facility (if it were otherwise permissible) in a manner that ensures that drainage in and from the area does not erode or destabilize the bluff. The lack of the site-specific geotechnical investigation report thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.10. LUP Policy 3.4-10 generally prohibits development on the bluff face, but, *first*, CTD1 has failed to delineate the bluff edge that defines the upper termination of the bluff in the area westerly of Post Mile 42.1. In addition, LUP Policy 3.4-10 provides that development that would substantially further the public welfare may be allowed as a conditional use, following a full environmental, geologic and engineering review and upon the determinations that no feasible less environmentally damaging alternative is available and that feasible mitigation measures have been provided to minimize all adverse environmental effects, but, *second*, CTD1 has failed to perform the required technical studies and mitigation analysis to meet that standard. The lack of the site-specific geotechnical investigation report, alternatives analysis, and mitigation analysis for the proposed bluff edge structure near Post Mile 42.1 thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.11. LUP Policy 3.5-5 provides for tree removal or thinning to avoid concentrations of trees that unreasonably obstruct views of the ocean, e.g., from roads. *First*, as the United Coast Survey topographical map of the Navarro Point marine terrace (T-1362, 1872) shows, its historical conditions included a substantial stand of trees on the delta (alluvial fan) of the west-trending Navarro stream and a smaller additional grove along the toe of the west-facing Navarro Ridge slopes near where trees currently occur along the seaward side of the Highway 1 road berm. *Second*, CTD1 has provided no documentation or analysis in the CDP application of existing concentrations of trees within the Project area that unreasonably obstruct ocean views from Highway 1. *Third*, CTD1 has provided no analysis in the CDP application of whether careful tree thinning along Highway 1 in the Project area would open public views of the ocean that are now unreasonably obstructed. *Fourth*, CTD1 proposes wholesale removal of all trees, including previously killed trees, on the Navarro Point Preserve to be able to expand the Highway 1 road prism onto it, which Project component on its face substantially exceeds any reasonable trimming or removal of selected trees to open ocean views from Highway in the tree-vegetated segment, and thus is inconsistent with LUP Policy 3.5-5. The CDP application thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.12. LUP Policy 3.5-9 provides for review of the location of all new access roads in rural areas prior to any grading work to ensure safe location and minimum visual disturbance. *First*, CTD1 has previously informed property owners in the RR-5-PD land use designation that it proposes to utilize a former (abandoned) road down the west-facing Navarro Ridge as a mechanized equipment access corridor to perform excavation grading of these slopes from the relatively flat adjacent Ridge top, working downslope to Highway 1. *Second*, the CTD1 Project plans contain no grading plans for the area of CTD1' proposed Navarro Ridge slope grading access road, inconsistent with LUP Policy 3.5-9. *Third*, the CDP application contains no visual impact analysis of the proposed Navarro Ridge grading access road, inconsistent with LUP Policy 3.5-9. This only partly disclosed Project component thus precludes the CPA's ad Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.13. LUP Policy 3.6-17, when harmonized with LUP Map 19, requires CTD1 to construct a turnout on the westerly side of Highway 1 near Post Mile 41.8 as part of any highway improvement project. *First*, CTD1 failed to comply with this requirement when it has previously performed improvement projects near Post Mile 41.8, inconsistent with LUP Policy 3.6-17. *Second*, the CDP application fails to include the required turnout, inconsistent with LUP Policy 3.6-17, but instead proposes a continuous 4-foot wide shoulder that by design does not constitute the LCP-designated nestled turnout in the gateway and in fact would preempt it. The CDP application thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.14. LUP Policy 3.8-1 requires that highway capacity be a standard for review of the projects. However, CTD1 has presented no data in the withdrawn CDP applications - and can present none, because none exists - that either the "Navarro Ridge Safety Project" or the "Navarro drainage" project are necessary to meet current or future Highway 1, or Highway 1-Navarro Ridge Road intersection, capacity demand. To the extent that the term "capacity demand" may be construed to include safety considerations, alternative feasible, less environmentally damaging project components exist to the withdrawn CDP application project descriptions that can provide for an increased safe roadway environment, including, but not limited to, (a) day/night/weather condition-responsive posting of reduced vehicle speeds, (b) posting of wildlife corridor crossing signs, (c) development of lane shoulders within the CTD1-claimed 2020 highway right of way and by minor fill or cantilevered segments along the southbound travel lane, (d) placing the existing drainage ditch along the northbound Highway 1 travel lane in a conduit, with appropriate filtration and water diffusion components for sustainable discharge to existing Navarro Point Preserve wetlands, and for other non-potable uses, (e) redirecting the highly erosive drainage outfall at the Navarro Bluff/Cliff westerly of Post Mile 42.1 to a non-erosive drainage discharge facility, and, (f) restoring the historic Navarro Stream to its natural and sustainable stream bed by removal of the superannuated road prism fill (and avoidance of any new fill, wetlands destruction/disturbance, or other artificial hydromodifications), with replacement by a suitably designed elevated roadway span that comports with the designed highly scenic area. In

any event, no current CDP application for either project is now before the CPA for decision and CTD1 has time, during preparation of the required substantive environmental document for these projects (and the whole 4-mile long CTD1 Highway 1 project in Albion between the Navarro River and Dark Gulch), to further address these alternatives. The CDP application thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.2.15. LUP Policy 3.4-10 generally prohibits development on the bluff face. However, CTD1 has failed to delineate the bluff edge that defines the upper termination of the bluff in the area westerly of Post Mile 42.1. In addition, LUP Policy 3.4-10 provides that development that would substantially further the public welfare may be allowed as a conditional use, following a full environmental, geologic and engineering review and upon the determinations that no feasible less environmentally damaging alternative is available and that feasible mitigation measures have been provided to minimize all adverse environmental effects. However, CTD1 has failed to perform the required technical studies and mitigation analysis to meet that standard, and the CDP application thus precludes the CPA's and Board's finding of Project consistency with the LCP required by CZO § 20.532.095(A)(1).

4.3. Development Project Inconsistencies with the Coastal Act.

PRC § 30604(c) requires that every coastal development permit issued for any development between the nearest public road and the sea, or the shoreline of any body of water located within the coastal zone, shall include a specific finding that the development is in conformity with the public access and public recreation policies of Chapter 3 (commencing with Section 30200).

However, the CDP application for both projects failed to include the lateral (upcoast-downcoast) improved California Coastal Trail through the Navarro Point Preserve parcels on which CTD1 proposes to develop the parcel, inconsistent with PRC §§ 30210 (to maximize public access for all the people), 30211 (to avoid interference with existing public access trail segments in or near the proposed Highway 1 road prism expansion onto Navarro Point Preserve), 30212(a) (required public access along the coast where proposed drainage facilities, fill, and discharge of polluted highway corridor waters would block or impede existing lateral public access), 30213 (provision of lower cost visitor and recreational facilities, e.g. where the project proposes to fence off the driveway access to the Navarro Point Preserve parking lot, trails, and the California Coastal Trail), 30221 (to protect oceanfront land [e.g., on the Navarro Point Preserve, including but not limited to the driveway, parking lot, California Coastal Trail, and other trails] suitable for recreational use, without analysis of whether adequate provision of public recreational facilities exists to meet present and foreseeable future demand in the project area), 30252 (new development shall maintain and enhance public coastal access by facilitating/extending transit service and providing for non-automobile circulation within the development), and 30253(e) (new development shall protect special communities and neighborhoods - as here, Albion and the Navarro Point Preserve - that, because of their unique characteristics, are popular visitor destination points for recreational uses. Unfortunately, neither the PBS staff report nor the CPA's Decision analyzed the project for consistency with each of these standards.

In fact, the project reduces, rather than maximizes, public access to and along the California Coastal Trail and other vertical and lateral public trails in the Navarro Point Preserve for all the people by (1) obstructing it with impermissible drainage facilities and discharges of polluted water, inconsistent with PRC § 30210, and (2) preventing access to them at the only improved

access location during the likely (2-year) project construction period. The existing box culvert drainage facility near PM 41.8 does constitute a vertical public accessway between Highway 1 or Navarro ridge and the Navarro Point Preserve, and the CDP application contains no proposed box culvert improvements that would create a new ADA-compliant new public access way in it. Similarly, the project interferes with existing California Coastal Trail and intra-Navarra Point Preserve public access trail segments by that fenced closure during construction and long-term obstructions, inconsistent with PRC § 30211.

In fact, the project proposes no new functional and sustainable public access facilities at all, inconsistent with PRC § 30212(a). Closure of the Navarro Point Preserve driveway, parking lot, California Coastal Trail, and internal Preserve public access trails - all of which may be used by the public without charge - during construction and subsequent project drainage operations prevents rather than provides lower cost visitor and recreational facilities, inconsistent with PRC § 30213. The project proposes to usurp oceanfront land on the Navarro Point Preserve, including but not limited to the driveway, parking lot, California Coastal Trail, and other trails, suitable for recreational use, for project road prism widening, drainage facility location, and polluted water discharges from the project area, inconsistent with PRC § 30221. Further, the project proposes neither internal Navarro Point Preserve non-automobile circulation improvements nor to provide funding for Mendocino coast transit services, inconsistent with -29-PRC § 30252. Finally, the project fails to protect the Albion special community and the Navarro Point Preserve neighborhood, both popular visitor destinations, inconsistent with PRC § 30253(e).

The truncated three-paragraph analysis on the CPA's Decision (page 15/71) limits itself to an inaccurate description of the project's geospatial scope, its unexamined traffic controls during construction in the peak summer visitor-recreational season, and a selective repetition of an internally inconsistent CTD1 representation regarding closure of the Navarro Point Driveway, parking lot, California Coastal Trail, and internal preserve trails. The analysis - which erroneously states that the project will not close public access to Navarro Point Preserve and its trails during construction and to the latter during subsequent project drainage operations (CPA Decision, pages 15-16, 18) - does not serve to document project compliance with (1) Coastal Act Chapter 3 public access-recreational policies, discussed above, (2) with the requirement of Coastal Element Policy 3.6-6 that shoreline access points shall be at frequent rather than infrequent intervals for the convenience of both residents and visitors and to minimize impacts on marine resources at any one point, and that wherever appropriate and feasible, public access facilities, including parking areas, shall be distributed throughout the coastal area so as to mitigate against the impacts, social or otherwise, of overcrowding or overuse by the public of any single area, and (3) the continuously identifiable County coastal trail set forth in Coastal element Policy 3.6-21.

The Project thus is inconsistent with the Coastal Act Chapter 3 public access and recreation policies, and the CPA's and Board's findings of project consistency do not - and cannot - demonstrate the project to be consistent with the Coastal Act Chapter 3 public access and recreation policies, as required in the LCP by CZO § 20.532.095(B)(1), and with the LCP Coastal Element Policies, as required by CZO § 20.532.095(A)(1).

5. The Conditions of Approval Adopted By the CPA and Affirmed by the Board Do Not Bring It Into Compliance with the LCP and the Coastal Act.

Condition 1 of the CPA's Decision is (a) procedural, (b) vague in its description of the Coastal Act and LCP procedures and time lines for appeals of CPA decisions on valid CDP applications and therefore not implementable, and (c) in its threshold requirement that development pursuant to a CDP merely be "initiated" fails to meet the development vesting test established in

controlling case law (*AVCO Community Developers, Inc. v South Coast Regional Coastal Zone Conservation Commission*). Condition 1, adopted in the CPA's Decision, thus is void.

Condition 2 of the CPA's Decision is vague in its unexplicated term "continuous progress towards completion of the project", and therefore not enforceable, as the previous PBS Director demonstrated when he rejected the Albion Bridge Stewards objection to CTD1' extralegal performance of another component of the whole project, under color of County CDP 2016-0038 (Salmon Creek Bridge "geotechnical" [site mass grading and ESHA removal] project). Condition 2, adopted in the CPA's Decision, thus is void.

Condition 3 of the CPA's Decision in its preamble ("The application, along with supplemental exhibits and related material, shall be considered elements of the permit") is vague for failing to specifically identify the content of all supplemental exhibits and of all related material, and therefore not implementable. Condition 3, adopted in the CPA's Decision, thus is void.

Condition 4 of the CPA's Decision is vague in its reference to (a) the proposed project, for which the CDP Decision contains no finite (accurate, complete, internally consistent, settled, PBS-stamped received) textual description, maps, plans, cross-sections, elevations, other drawings, or photographic imagery, and (b) "the permit shall be subject to the securing of all necessary permits", without identifying the applicant(s) for such permits, or listing them. Condition 4, adopted in the CPA's Decision, thus is void.

Condition 5 of the CPA's Decision (a) provides for "applicants" to secure all required building permits, but fails to identify them (given that CTD1 in its CDP application identified no co-applicants), and (b) hinges on the contents of the "proposed project", for which the CPA's Decision contains no finite description (assuming that the withdrawn CDP were otherwise pending for decision). Condition 5, adopted in the CPA's Decision, thus is void.

Condition 6 is procedural and prospective, therefore invalid (as discussed above), and not enforceable, as the previous PBS Director demonstrated when he rejected the Albion Bridge Stewards objection to CTD1' fraudulent application for, and repeated violations of the conditions of approval in the CPA decision's for, issued County CDP 2016-0038. Condition 6, adopted in the CPA's Decision, thus is void.

Condition 7, by its disclaimer of project parcel legality, purports to defeat the clear LCP requirement that other divisions of land for non-recreational development and use, as here, require a CDP. Condition 7, adopted in the CPA's Decision, thus is void.

Condition 8, for failing to require a qualified and independent archeological monitor of the project area, lacks the necessary measure for its implementation and is therefore meaningless, no archeological survey of the whole project having been disclosed in the CDP application record. Condition 8, adopted in the CPA's Decision, thus is void.

Condition 9 provides that the contractor performing the work "shall provide proof of appropriate disposal of exported material to CTD1 and "the County prior to close out of construction". This after-the-fact compliance condition is speculative, lacks requisite specificity for analysis of project component consistency with the LCP and Coastal Act. Condition 9, adopted in the CPA's Decision, thus is void.

Condition 10 is essentially meaningless, in that it limits the requirement for vegetation restoration of graded areas to "any soil disturbed *after* construction", when (a) project excavation will remove all soil from the grading envelope on the west-facing Navarro Ridge natural landform, (b) CTD1 proposes to import no new soil to it, and (c) the CPA's Decision (if it were otherwise valid) authorizes no post-construction soil disturbance. Condition 10, adopted in the CPA's Decision, thus is void.

The CPA failed to give the required 10-day advance notice of all referenced (complete) substantive contents of Condition 11, as adopted in the CPA's Decision. Failure to timely notice and produce the complete documents denied the Albion Bridge Stewards and the co-appellants with essential information about the project, and thus denied due process to them. Moreover, Condition 11 relies on outdated technical studies that recommend certain mitigation measures based on data that is variously up to over four years old, not demonstrated to be indicative of current site conditions, and thus not substantial evidence on which the CPA can render a decision (if the CDP application were still pending, which it is not). Condition 11 therefore fails (a) for lack of proper notice, and (b) reliance on outdated data to support mitigations incorporated by reference in the CPA's Decision, and thus is void.

6. The Findings in the CPA's Decision are Unsupported by a Valid CDP Application, Current Data, Analysis of Current Data, and Analysis of the Disclosed and Undisclosed Project Components with the Applicable Standards of Review.

6.1. As discussed above, the incomplete CTD1 application for CDP 2019-0024 became deemed withdrawn by operation of the CZO on or about July 1, 2020, and the CPA had no valid pending CDP application for the CTD1 "Navarro Ridge Safety Project" before him for decision on November 17, 2021. The CPA's Decision is therefore void.

6.2. Contrary to Finding 1, the proposed development is not in conformity with the certified Local Coastal Program, as discussed above. Moreover, the CDP application record contains no evidence that (unspecified) "resource agencies" have reviewed and agree on "appropriate [ESHA] protection measures" for the projects. CPA Decision Finding 1 is therefore void.

6.3. Finding 2 misrepresents the adequacy of existing project access roads (which the Decision does not analyze), the scope of drainage components in the project, and relies on a vague reference to "other necessary facilities" for its conclusory finding of project consistency. As discussed *infra*, CPA Decision Finding 2 is unsupported by current relevant data and analysis of it for consistency with the LCP standards of review, and therefore void.

6.4. Finding 3 misstates that the project is consistent with (a) the purposes of the Zoning Districts in which it is located (having not analyzed or demonstrated the specific consistency requirements for each District) and (b) with other unspecified CZO provisions, in that the projects are specifically inconsistent in numerous ways with the CZO and the Coastal Element, as discussed above. As discussed *infra*, CPA Decision Finding 3 is unsupported by current relevant data and analysis of it for consistency with the LCP standards of review, and therefore void.

6.5. Finding 4 is (impermissibly) conclusory in that (a) the respective CTD1 Class 1(d) categorical exemption of the project from environmental review is inapplicable to the project, and thus not a valid environmental document for it, and (b) the project implicates unusual circumstances and will have potentially significant direct and cumulative adverse effects on the environment, as discussed above, and thus requires environmental review. As discussed *infra*, CPA Decision Finding 4 is unsupported by current relevant data and analysis of it for consistency with the LCP standards of review, and therefore void.

6.6. As discussed *infra*, CPA Decision Finding 5 relies on a meaningless archeological resource observation provision by a contractor who is not qualified to perform it, and is therefore void.

6.7. Finding 6 states that public roadway capacities have been considered and are adequate, when in fact the (withdrawn) CDP application record contains no current road capacity data.

Moreover, CTD1' proposed use of the western Navarro Ridge internal (private) road to implement project excavation and potentially other (e.g., drainage) project components, including as a staging area for them, indicates that the capacities of Highway 1 and Navarro Ridge Road are inadequate to serve the project. As discussed *infra*, CPA Decision Finding 6 is unsupported by current relevant data and analysis of it for consistency with the LCP standards of review, and therefore void.

6.8. Finding 7 purports, without analysis of each project component that implicates applicable County Coastal Element public access policies, and without analysis of each component that implicates the relevant Coastal Act public access and recreation policies, that the project conforms to them. CTD1' own project site plans demonstrate the finding that "All existing public access within the vicinity of the project area will be accessible throughout construction activities" to be in error, as the clear identification of the exclusionary fencing across the entrance to the Navarro Point Preserve for the (likely) 2 year project construction season period shows. As discussed *infra*, CPA Decision Finding 7 is unsupported by the project plans and analysis of them for consistency with the LCP standards of review, and therefore void.

6.9. Finding 8 purports, without (a) analysis of the seasonal spectrum of current conditions in the encompassing project development envelope, (b) definition of respective levels of project impact significance, (c) the required geotechnical investigation report, and (d) independent analysis of available alternatives, that the the proposed development is consistent with ESHA policies that require the following findings: (1) The resources as identified will not be significantly degraded by the proposed development; (2) There is no feasible less environmentally damaging alternative; and (3) All feasible mitigation measures capable of reducing or eliminating project related impacts have been adopted. As discussed *infra*, CPA Decision Finding 8 is unsupported by current relevant data, articulated threshold criteria, and analysis of them for consistency with the LCP standards of review, and therefore void.

6.10. In addition, neither the CPA nor the Board adopted the required findings in Cal. Code of Regs., §13311 that, respectively, (a) they reviewed the Coastal Commission's interpretive guidelines in connection with Case# 2019-0024, (b) the proposed development (if, *arguendo*, a valid pending CDP application had been before them) conforms with the requirements of Public Resources Code, Section 30604(c), and (c) that with any applicable decision set by the Coastal Commission pursuant to Public Resources, Section 30625(c).

7. The Appeal Raises Issues of Substantial Statewide Significance.

As discussed and shown above, this appeal to the Coastal Commission of the Mendocino County Board of Supervisor's action to "affirm" the CPA's prior decision to conditionally approve development, and to simply ignore other development, implicated in Case# CDP2019-0024 raises multiple LCP and Coastal Act implementation issues of substantial statewide significance as a result of the County decision-makers' failure to implement, including, but not limited to:

- the LCP protection and development subordination requirements for the designated highly scenic gateway to the Mendocino Coast above the Navarro River;
- the LCP protection requirements for ESHA;
- the LCP hazardous geologic conditions site-specific identification and avoidance or mitigation requirements as they apply in relation to highway and drainage

facility development at Navarro Cliff, on the Navarro Point Preserve, and Navarro Ridge;

- the LCP requirements for protected existing and sustainable public access and recreational opportunities associated with banded trails, including the California Coastal Trail, on the Navarro Point Preserve;
- the LCP requirements for CDP application submittal, filing, termination for incompleteness, and noticing; and,
- the LCP requirements for current coastal resource data and analysis as the predicate for CDP decision-making.

8. Conclusion and Request.

The Albion Bridge Stewards and Co-Appellants have shown that the appeal raises issues of substantial statewide significance in the implementation of the Coastal Act-delegated CDP regulatory process at Mendocino County.

We respectfully request the Coastal Commission to so find, and determine that the action of the Board on Case#2019-0024 was null and void because the action of the CPA was null and void for lack of an actionable CDP application at the time of decision.

We reserve our right to supplement this appeal with additional information, and request an opportunity at the earliest mutually convenient practicable time to discuss our contentions in this appeal.

Respectfully submitted (on behalf of the Albion Bridge Stewards and Co-Appellants),
(by authorized electronic signatures)