

**CALIFORNIA COASTAL COMMISSION**

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**F9a**

**A-1-MEN-22-0014**

**(Caltrans District 1, Mendocino County)**

**February 10, 2023**

**CORRESPONDENCE**

**From:** [Karen Bowers](#)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Cc:** [Leonardo Bowers](#)  
**Subject:** Navarro Ridge Safety Project. Public Comment on February 2023 Agenda Item Friday 9a - Appeal No. A-1-MEN-22-0014 (Caltrans, Mendocino County)  
**Date:** Sunday, January 22, 2023 2:42:50 PM

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Dear California Coastal Commission Members,

I live on Navarro Ridge Road, Albion at the 4.12 mile marker. I write to you in full support of the Navarro Ridge Safety Project, February 10 Agenda item 9a.

Personal experience:

In mid December traveling north on Hwy 1 in the vicinity of Navarro Point, my car went over some road debris that took out the inner wall of my driver side tire. While I was able to pull over once I found a pull out, the area was extremely narrow and difficult to administer any road side assistance to my tire. With the help of a passerby, I was able to drive to the next very narrow pull out. Signal to call AAA was nil in the first pullout and difficult in the second. It was raining and growing dark. We need reasonable Hwy 1 pull outs and guard rails along this narrow and winding area of road.

Navarro Ridge Road needs widening! Traveling west on Navarro Ridge Road from my driveway, it is a feat to drive when a huge truck, usually a fuel truck is coming up the road particularly in the stretch heading to Hwy 1. It is narrow and curving. Ditches on the sides of the road. I have seen cars and trucks stuck in these ditches.

Some of my friends who have filed this appeal live on Albion Ridge and Middle Ridge. They have lately filed a petition to get potholes fixed on their roads. Traveling over so many treacherous pot holes on Navarro Ridge Road, I sympathize with their initiative, though I know that funds to truly engineer and fix our roads are not available to rural Mendocino County.

While Caltrans may not always be fully appreciative of local sympathies, I do believe that Safety is of prime concern here. The Navarro Ridge Safety Project appears to be designed to fix some significant road Safety issues.

As a concerned citizen and resident affected by the Project, I ask the Commission to deny this appeal. Thank you for your consideration.

Karen Bowers  
[karenbowersu2@gmail.com](mailto:karenbowersu2@gmail.com)

**From:** [Leavitt, Amber@Coastal](mailto:Leavitt.Amber@Coastal)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Subject:** FW: Coastal Commission Meeting 2-10-2023, item # 9a  
**Date:** Thursday, February 2, 2023 12:54:08 PM

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**From:** Gregg J. Gold <[greggigold@aol.com](mailto:greggigold@aol.com)>  
**Sent:** Wednesday, February 1, 2023 10:38 PM  
**To:** Brownsey, Donne@Coastal <[donne.brownsey@coastal.ca.gov](mailto:donne.brownsey@coastal.ca.gov)>; Hart, Caryl@Coastal <[caryl.hart@coastal.ca.gov](mailto:caryl.hart@coastal.ca.gov)>; Bochco, Dayna@Coastal <[dayna.bochco@coastal.ca.gov](mailto:dayna.bochco@coastal.ca.gov)>; Turnbull-Sanders, Effie@Coastal <[effie.turnbull-sanders@coastal.ca.gov](mailto:effie.turnbull-sanders@coastal.ca.gov)>; Aminzadeh, Sara@Coastal <[sara.aminzadeh@coastal.ca.gov](mailto:sara.aminzadeh@coastal.ca.gov)>; Maddy Jo Avila <[mja118@humboldt.edu](mailto:mja118@humboldt.edu)>; Erick Eschker <[Erick.Eschker@humboldt.edu](mailto:Erick.Eschker@humboldt.edu)>; Ava Frankovsky <[avafrankovsky@gmail.com](mailto:avafrankovsky@gmail.com)>; Myzanne Huss <[mh359@humboldt.edu](mailto:mh359@humboldt.edu)>; Sarah Romero Pavon <[sbc55@humboldt.edu](mailto:sbc55@humboldt.edu)>; Rice, Katie@Coastal <[katie.rice@coastal.ca.gov](mailto:katie.rice@coastal.ca.gov)>; Harmon, Meagan@Coastal <[meagan.harmon@coastal.ca.gov](mailto:meagan.harmon@coastal.ca.gov)>; Uranga, Roberto@Coastal <[roberto.uranga@coastal.ca.gov](mailto:roberto.uranga@coastal.ca.gov)>; Faustinos, Belinda@Coastal <[belinda.faustinos@coastal.ca.gov](mailto:belinda.faustinos@coastal.ca.gov)>; Grace Belt <[gb164@humboldt.edu](mailto:gb164@humboldt.edu)>; Jeffrey Frederick <[jlf485@humboldt.edu](mailto:jlf485@humboldt.edu)>; Martin Rojas <[mar234@humboldt.edu](mailto:mar234@humboldt.edu)>; Chloey Scott <[ccs92@humboldt.edu](mailto:ccs92@humboldt.edu)>; Rivas, Rick@Coastal <[rick.rivas@coastal.ca.gov](mailto:rick.rivas@coastal.ca.gov)>; Aguirre, Paloma@Coastal <[paloma.aguirre@coastal.ca.gov](mailto:paloma.aguirre@coastal.ca.gov)>; Wilson, Mike@Coastal <[mike.wilson@coastal.ca.gov](mailto:mike.wilson@coastal.ca.gov)>; Diamond, Francine@Coastal <[francine.diamond@coastal.ca.gov](mailto:francine.diamond@coastal.ca.gov)>; Mann, Zahirah@Coastal <[zahirah.mann@coastal.ca.gov](mailto:zahirah.mann@coastal.ca.gov)>; Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>; Gray, Shana@Coastal <[Shana.Gray@coastal.ca.gov](mailto:Shana.Gray@coastal.ca.gov)>; Warren, Louise@Coastal <[Louise.Warren@coastal.ca.gov](mailto:Louise.Warren@coastal.ca.gov)>; Escalante, Linda@Coastal <[linda.escalante@coastal.ca.gov](mailto:linda.escalante@coastal.ca.gov)>; Mandelman, Rafael@Coastal <[rafael.mandelman@coastal.ca.gov](mailto:rafael.mandelman@coastal.ca.gov)>; [Malley@coastal.ca.gov](mailto:Malley@coastal.ca.gov)  
**Subject:** Coastal Commission Meeting 2-10-2023, item # 9a

Dear Coastal Commissioners and Commission Staff,

On behalf of the Sierra Club Coastal Subcommittee for California, I am writing to let you know that we strongly oppose the Caltrans Navarro Ridge Safety project on Highway 1. This proposed project lies in the coastal zone. This stunningly beautiful area is something that should be preserved for generations to come. The Caltrans project would destroy this beauty.<sup>[1]</sup> Destructive grading will have major impacts on the scenic quality of the Gateway, as seen along the highway and from many of the trails on the Preserve. In addition, scenic views of the ocean would be obstructed by the Midwest Guardrail System. In addition, this project would permanently block the California Coastal Trail and others on the Preserve and seasonally block or substantially impede the safe use of trails on the Preserve.

Feasible and less environmentally damaging alternatives exist to this Caltrans project. This project will destroy a precious part of California's coastal natural resources, and once these are gone, they are gone forever. We are respectfully asking you to either remand the case back to the County and Caltrans with appropriate Coastal Act guidance or for you to render a substantive decision that upholds the Coastal

Act. <sup>[1]</sup>  
[SEP:SEP]

Sincerely,

SEP:SEP:

Gregg J. Gold, Ph.D.

Redwood Chapter Sierra Club, North Group Chair

1513 Beverly Drive

Arcata, CA, 95521

[greggold@aol.com](mailto:greggold@aol.com)

Coastal Commission Meeting 2-10-2023, item # 9a

Commissioners and Commission staff,

I am writing in support of the Appeal by the Albion Bridge Stewards of the Navarro Ridge Safety Project A-1-MEN-22-0014 which proposes to significantly alter the roadway and environs of Highway 1 between post miles 41.78 and 42.3, and includes the staging area at post miles 42.4.

I want it sent back to the Mendocino County Board of Supervisors (BOS) with some guidance as to the requirements of the Coastal Act. The Mendocino County Board of Supervisors debated for an hour and recorded in the minutes of the meeting that Caltrans and the California Coastal Commission (CCC) were supposed to work together to evaluate the safety of alternate Guardrail railings that would minimize loss of view. That did not take place. This Project will substantially alter the Highly Scenic Designated highway which in fact presents the Albion Gateway view of the majestic Pacific Ocean. People come from far and wide, indeed from all over the world, for this view. The humble and unaltered surround only serves to accent this timeless vista.

The Navarro Ridge Safety Project proposes to seriously alter the landform on the east side of Highway 1 by removing as much as 14,075 cubic yards of material; blasting through rock where deemed necessary; taking out up to 75 trees; in fact all vegetation to a height of up to 55 feet. Some material from the excavation (3,858 cubic yards) will be used as fill on the west side of the highway and on the Navarro Point Preserve. This would happen in order to widen the lanes to 12 feet and create 4 foot wide paved shoulders on both sides of the two 12 foot wide travel lanes.

The deposits of these spoils on the west side of Highway 1 and on the Navarro Point Preserve, will impact emergent wetlands and block the Coastal Trail. The runoff from the several altered drainages may potentially impact the cliff and rocks of the California Coastal Monument.

The Albion Bridge Stewards informed Caltrans, the Coastal Permit Administrator, BOS, and CCC that these projects (the Navarro Ridge Safety Project and the Navarro Drainage Project) should be considered as one project and the cumulative effect considered of these projects. In addition the cumulative effects of all the local street and bridges widening projects along the Mendocino County coastline like the Albion River Bridge Replacement/Rehabilitation, Salmon Creek Bridge Replacement, Salmon Creek Sandblast Waste abatement, Gualala Downtown Streetscape Enhancement, Elk Creek Bridge Replacement, Jack Peters Bridge Widening & Rail Upgrade, Hare Creek Bridge Rehabilitation, Fort Bragg ADA Project, and the Pudding Creek Bridge Widening & Rail Upgrade need to be considered as well.

How can this project be exempt from environmental review? Is it just because it is labeled a "Safety Project" when indeed it is rather another "Drainage Project" considering that this project includes modifications to eight drainage systems that intersect the highway within the

project limits? The distance between these projects (post mile 42.3 and 42.35) is minuscule especially considering that the staging area is at post mile 42.4. Why is this not piecemealing? The Coastal Act does not allow piecemealing.

In this, a designated "Highly Scenic" area, development must be subordinate to the surround. It is disingenuous of the staff to deem it a project of no significant impact. The impacts will be enormous and what should be a timeless legacy to posterity will be butchered and scraped and overhauled and buttressed. There is no collapse of this roadway. There is no need to take the tax dollars of the people of California to refashion a roadway and a view shed that is in and of itself amazing. Surely a more modest project can be developed which addresses the issue of safety should any exist and enhances the properties of the area. Are there studies that have found that a safety issue exists? According to the Report, Caltrans claims that this stretch of the highway has a higher than statewide average rate of run-off-road collisions without comparing this area to other nearby areas like Dark Gulch or the beach access next to Big River in Mendocino for example. The Midwest Guardrail System at eye level of those traveling in passenger vehicles is an affront.

Please send this project back to County staff with the direction to take an in person look at the site and to follow the directives of the Coastal Act.

Thank you for the opportunity to comment.

Mary Walsh, Chair, Sierra Club Mendocino Group

27401 Albion Ridge Road, Albion CA 95410

<[bella@mcn.org](mailto:bella@mcn.org)>

2-3-2023

**From:** [Leavitt, Amber@Coastal](mailto:Leavitt.Amber@Coastal)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Subject:** FW: Coastal Commission Meeting 2-10-2023 #9A  
**Date:** Tuesday, February 7, 2023 1:20:54 PM

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**From:** shellely martin <[shelleymartin@mcn.org](mailto:shelleymartin@mcn.org)>  
**Sent:** Thursday, February 2, 2023 11:13 AM  
**To:** Brownsey, Donne@Coastal <[donne.brownsey@coastal.ca.gov](mailto:donne.brownsey@coastal.ca.gov)>; Hart, Caryl@Coastal <[caryl.hart@coastal.ca.gov](mailto:caryl.hart@coastal.ca.gov)>; Bochco, Dayna@Coastal <[dayna.bochco@coastal.ca.gov](mailto:dayna.bochco@coastal.ca.gov)>; Turnbull-Sanders, Effie@Coastal <[effie.turnbull-sanders@coastal.ca.gov](mailto:effie.turnbull-sanders@coastal.ca.gov)>; Aminzadeh, Sara@Coastal <[sara.aminzadeh@coastal.ca.gov](mailto:sara.aminzadeh@coastal.ca.gov)>; Escalante, Linda@Coastal <[linda.escalante@coastal.ca.gov](mailto:linda.escalante@coastal.ca.gov)>; Rice, Katie@Coastal <[katie.rice@coastal.ca.gov](mailto:katie.rice@coastal.ca.gov)>; Harmon, Meagan@Coastal <[meagan.harmon@coastal.ca.gov](mailto:meagan.harmon@coastal.ca.gov)>; Uranga, Roberto@Coastal <[roberto.uranga@coastal.ca.gov](mailto:roberto.uranga@coastal.ca.gov)>; Faustinos, Belinda@Coastal <[belinda.faustinos@coastal.ca.gov](mailto:belinda.faustinos@coastal.ca.gov)>; Mandelman, Rafael@Coastal <[rafael.mandelman@coastal.ca.gov](mailto:rafael.mandelman@coastal.ca.gov)>; Rivas, Rick@Coastal <[rick.rivas@coastal.ca.gov](mailto:rick.rivas@coastal.ca.gov)>; Aguirre, Paloma@Coastal <[paloma.aguirre@coastal.ca.gov](mailto:paloma.aguirre@coastal.ca.gov)>; Wilson, Mike@Coastal <[mike.wilson@coastal.ca.gov](mailto:mike.wilson@coastal.ca.gov)>; Diamond, Francine@Coastal <[francine.diamond@coastal.ca.gov](mailto:francine.diamond@coastal.ca.gov)>; Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>; Gray, Shana@Coastal <[Shana.Gray@coastal.ca.gov](mailto:Shana.Gray@coastal.ca.gov)>; Warren, Louise@Coastal <[Louise.Warren@coastal.ca.gov](mailto:Louise.Warren@coastal.ca.gov)>  
**Subject:** Coastal Commission Meeting 2-10-2023 #9A

Dear Coastal Commissioners and Staff,

I live on Navarro Ridge Road and am very concerned that the widening of lanes will impede access to Hwy 1 in emergencies and just normal life. It also takes a terrible toll on the natural beauty and resources of the area. It seems that this project violates our coastal protections. I don't understand why less invasive and destructive methods can't be used. Please reconsider.

Best,  
Shelley Martin

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Coastal Commission Meeting 2-10-2023, item # 9a

Coastal Commissioners and Commission Staff,

I oppose the Caltrans Navarro Ridge Safety project on Hwy 1 in the coastal zone. In the Exhibits Caltrans writes that they will “Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”. This project does not provide any of the above mentioned qualities.

I wrote a letter and spoke at the Coastal Permit Administrator (CPA) meeting together with other members of the Albion Bridge Stewards (ABS). The CPA approved both projects, the Navarro Safety Project and the Navarro Drainage Project despite our extensive comments on 11-17-2021.

ABS appealed both projects to the Board of Supervisors (BOS). The Supervisors agreed on 4-5-2022 with the findings of the CPA. We (ABS) then appealed both projects to you, the California Coastal Commission (CCC). The CCC on 12-16-2022 indicated that they could not find substantial issues with the Navarro Drainage Project.

Why is it that in the Report on page 2 Appendix A: Substantive File Documents: Appeal File No. A-1-MEN-22-0014 Mendocino County’s Local Record for CDP No. CDP\_2019-0024 Mendocino County’s Certified Local Coastal Program no information is provided?

Why are CCC staff analyzing appeals of Caltrans projects when they are being paid by Caltrans? I understand that the partnership is welcomed by the Coastal Commission, but to the appellants it feels like a conflict of interest.

Have CCC staff notified Bay Area, Sacramento Valley, and other California/national/international members of the public who utilize the Albion Gateway to coastal Mendocino County of the hearing on the appeal? Why is it that appellants are forced to appeal during a zoom meeting only event and have no choice to attend in person? This does not seem to correlate with the rules and regulations set in place by the Coastal Act for facilitating best ways to communicate with CCC.

Caltrans has not submitted a settled (“finite”, PBS-stamped “Received”) development description to the Mendocino County Planning & Building Department (PBS) for the “Navarro Ridge Safety Project” since the original incomplete CDP application submittal that PBS received on 7-1-2019. That application remained incomplete at the one year deadline in 2020 for Caltrans to make it complete, and pursuant to the clear terms of CZO §20.532.035(F) it was deemed withdrawn. Thus, no valid development description in Case# 2019-0024 was in PBS’s possession on 11-17-2021, 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. ABS made sure that the CPA would know that.

IP Section 20.532.025 states:…The application shall include the following information: (D) Stamped envelopes addressed to each owner of property situated within three hundred (300) feet of the property lines of the project site (excluding roads), along with a list containing the names, addresses and Assessor's parcel numbers of same. Where the applicant is the owner of all properties within three



hundred (300) feet of the project site, stamped envelopes shall be provided and addressed to owners, of property situated within three hundred (300) feet of the applicant's contiguous ownership. (E) Stamped envelopes addressed to each occupant of property situated within one hundred (100) feet of the property lines of the project site (excluding roads), along with a list containing the names, addresses and Assessor's parcel numbers of same. Where the applicant is the owner of all properties within one hundred (100) feet of the project site, stamped envelopes shall be provided and addressed to each occupant of property situated within one hundred (100) feet of the applicant's contiguous ownership. (F) Stamped, addressed envelopes and a list of names and addresses of all other parties known to the applicant to have an interest in the proposed development... Caltrans did not notify all property owners within 300 feet of the property lines, nor occupants of property within one hundred (100) feet of the property lines, nor names and addresses of all other parties known to the applicant to have an interest in the proposed development. Caltrans had names and contact information of close to 100 people who attended the meeting about these two projects. Obviously they had an interest in these projects. Caltrans chose to collect the sign in sheets before all participants were able to sign in. Therefore participants created their own sign in sheets and gave them to Caltrans. Caltrans was not willing to have a discussion where everyone would hear everyone's questions and responses, but chose to use the "Delphi Technique" much to the dismay of the Albion community. Caltrans also chose not to contact people who live on Navarro Ridge Road who would be greatly inconvenienced by this 2 year project without considering the additional hardship caused by the Drainage project and other planned projects nearby. Caltrans also did not see it important to notify the nearby visitor-serving facilities like the Albion River Inn, the Ledford House, the Albion River Campground & Fishing Village, the Mendocino College Coastal Field Station in Albion, the Fenshalden Inn, Schooner's Landing Marina and Campground, and the Navarro Point Preserve (NPP).

The County erred by notifying adjacent landowners based off the location of the physical improvements of the project rather than based off the full exterior boundaries of the parcels upon which Caltrans has obtained approval to conduct work. Did Caltrans obtain lot line adjustments or other division of land approvals for its "seven" new parcels on which it proposes to construct the project? Caltrans failed to obtain a CDP for the parcel boundary adjustments associated with the project and also failed to obtain a Conditional Use Permit for the development proposed on various parcels outside of their right-of-way.

The "Notice of Pending Permit" flier posted close to Highway 1 and Navarro Ridge Road lacked a date of posting.

The Exhibits mention that the Native American tribes did not provide responses to the requests for comments. How many letters came back unopened? Many of the tribes during Covid closed their offices.

ABS informed Caltrans, the CPA, and the BOS that these projects (the Navarro Ridge Safety Project and the Navarro Drainage Project) should be considered as one project and the cumulative effect considered of these projects. In addition the cumulative effects of all the local street and bridges widening projects along the Mendocino County coastline like the Albion River Bridge Replacement/Rehabilitation, Salmon Creek Bridge Replacement, Salmon Creek Sandblast Waste abatement, Gualala Downtown Streetscape Enhancement, Elk Creek Bridge Replacement, Jack Peters

Bridge Widening & Rail Upgrade, Hare Creek Bridge Rehabilitation, Fort Bragg ADA Project, and the Pudding Creek Bridge Widening & Rail Upgrade need to be considered as well.

This "Safety Project" is rather another "Drainage Project" considering that this project includes modifications to eight drainage systems that intersect the highway within the project limits. The distance between these projects (post mile 42.3 and 42.35) is minuscule especially considering that the staging area is at post mile 42.4. The Coastal Act does not allow piecemealing.

Is this project exempt from environmental review as it is labeled a Safety Project? Categorical Exemption Class 1 d Section 15301 lists minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The key consideration is whether the project involves negligible or no expansion of use. The expansion of existing use is not negligible. The project does not qualify for the CEQA categorical exemption under which Caltrans filed the project.

People come from far and wide, indeed from all over the world to visit our great parks and open spaces, art and music festivals, fine visitor-serving facilities, and to experience the magnificent wonders, the highly scenic, fragile, environmentally sensitive, and unique rural Albion Gateway to the Pacific Ocean on the Mendocino coast. This project would substantially alter the Highly Scenic Designated highway which in fact presents the Albion Gateway view of the majestic Pacific Ocean. The Land Use Plan of Mendocino County and LUP 3.5-3 states... "highly scenic areas," within which new development shall be subordinate to the character of its setting... This development is not subordinate. The entire project is located in a mapped Highly Scenic Area. LUP 3.5-1 states:... New development in highly scenic areas designated by the County of Mendocino Coastal Element shall be subordinate to the character of its setting. 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. LUP 3.5-1 states:... views need to be protected to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas and, where feasible, to restore and enhance visual quality in visually degraded areas... This project is not consistent with the above mentioned policies, nor the Mendocino County Municipal Code.

LUP 3.5-5 states:... trees often commonly serve a valuable purpose in the control of erosion... The project would involve the removal of up to 75 trees. Considering that Caltrans never presented a geotechnical analysis how are we assured that the large cut and fill slopes will, in fact, ensure natural landform stability? With the increase of atmospheric rivers this stability needs to be guaranteed.

The County's findings do not support the tree removal of 75 trees, nor the removal of past unpermitted tree removal.

We all support a functional, and safe, coastal highway that conforms to the beautiful and naturally curved landscape, preserves the rare freshwater wetlands, the vital grassland habitat that sustains the Navarro Ridge-Navarro Point Preserve (NPP) regional wildlife corridor. Caltrans has not analyzed the Navarro Ridge-NPP wildlife corridor, and project construction and operations during the economic life of it.

For the residents the Navarro Ridge Road-Hwy 1 intersection is the only way in and out from their homes. There are proposals for staging areas next to that intersection at post mile 42.5. The two areas planned are problematic. It would be hard to see the traffic for people who want to access the highway from Navarro Ridge Road. Another one is an area next to the Coastal Trail where many tourists pull over to admire the view. That would eliminate access for recreational opportunity.

Hwy 1 connects the South Coast to the North Coast and also connects us to inland areas. Safety during construction is of critical importance. Straightening and widening of the two-lane highway has consistently resulted in unmitigated environmental destruction, increased vehicle speeds and resultant collisions, and injuries or death to humans and wildlife.

According to the Report, Caltrans claims that this stretch of the highway has a higher than statewide average rate of run-off-road collisions without comparing this area to other nearby areas like Dark Gulch or the beach access next to Big River in Mendocino for example. Why widen and straighten the highway in this location when Hwy 128 next to the Navarro River leading to the project site will not and can not be widened?

In order to increase the roadway travel lanes from approximately 11.5 to a consistent 12 feet and add two 4-foot paved shoulders the Navarro Ridge bluffs will be denuded of most of the vegetation (reduced buffers for 9 Environmentally Sensitive Habitat Areas (ESHA's), and removal of up to 75 trees. The project is inconsistent with the ESHA protection policies of the certified LCP as discussed in our appeal and is not the least environmentally damaging feasible alternative. In fact there is no alternative to this project discussed as it is apparently exempt from CEQA. Information related to ESHA was out of date and incomplete. The biological reports do not address past drought conditions and are variously 2-4 years out of date: the fig leaf update paragraphs are incomplete and inadequate to remedy that major gap. The project does not include measures to assure that the site will be successfully revegetated. There is no coherent/complete project impact area revegetation plan. Caltrans' track record shows that promises of revegetation are empty promises as the north end of the state and federally recognized historic 78 year old timber trestle Albion River Bridge is showing after the geotechnical investigation.

The Disturbed Soil Area 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. How can such a project be considered exempt from environmental review?

Destructive grading will have major impacts on the scenic quality of the Gateway as seen from Hwy 1, from many of the trails at the NPP, and from the ocean. It will effect the Navarro Ridge bluffs and the NPP. The Report failed to analyze the project's excavation of the west-facing Navarro bluff - now reportedly to a height of up to 55 feet above the roadway - on (a) public visual quality, and (b) on land form stability. The Mendocino Planning and Building Services Department apparently forgot to require - or analyze - a Caltrans grading plan.

Caltrans did not address how long they are intending to fence off the access to NPP. The Report states that the project will not block access to the NPP, but omits Caltrans' fence plans during construction and any analysis of the project impacts on the Navarro Point trail where it runs near the proposed widened highway prism.

Caltrans has not analyzed the direct and cumulative impacts on the NPP hydrology and freshwater wetlands from project drainage components. The project proposes various changes to area hydrology (overland flow, percolation, groundwater), but the Report altogether omits analysis of the impact of the new, larger, longer culverts on wetlands in the Preserve, on the nearby Navarro bluff near Post Mile 42.3, or on the existing drainage channels (that Caltrans proposes to fill).

This project proposes to seriously alter the landform on the east side of Hwy 1 by removing as much as 14,075 cubic yards of material; blasting through rock where deemed necessary; taking out up to 75 trees and all vegetation to a height of up to 55 feet east of Hwy 1. Some material from the excavation (3,858 cubic yards) would be used as fill on the west side of the highway in order to widen the lanes to 12 feet and create 4 foot wide paved shoulders on both sides of the two 12 foot wide travel lanes. LUP 3.5-4 states:...Minimize visual impact of development on hillsides by (1) requiring grading or construction to follow the natural contours; (2) resiting or prohibiting new development that requires grading, cutting and filling that would significantly and permanently alter or destroy the appearance of natural landforms;...IP Section 20.504.015 also states:...C (6) Minimize visual impact of development on hillsides by the following criteria: (a) Requiring grading or construction to follow the natural contours;...IP Section 20.492.010 states: Grading Standards... (B) Development shall be planned to fit the topography, soils, geology, hydrology, and other conditions existing on the site so that grading is kept to an absolute minimum. (C) Essential grading shall complement the natural land forms. At the intersection of a manufactured cut or fill slope and a natural slope, a gradual transition or rounding of contours shall be provided...and LUP 3.5-1 also states:...to minimize the alteration of natural land forms...What we see here is that the alteration (widening and straightening of Hwy 1) does not follow the natural contours, and does not minimize the alteration of natural land forms. Grading is not kept to an absolute minimum and does not complement the natural land forms. Caltrans did not submit grading plans, a visual impact analysis of the proposed grading, nor a Geotechnical Design Report for the proposed grading of Navarro Ridge upslope from Hwy 1, and downslope along the toe of Navarro Ridge. Did Caltrans submit a current project transportation management (i.e., road closure) plan? Was the impacts on recreational, emergency response, work day traffic analyzed?

Planned is grading to heights of up to 55 feet on the east side, and 16 feet on the west side of Hwy 1. 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, used as fill elsewhere. This transport would fill close to 1,000 trucks. As they arrive empty that would add 2,000 trucks just for the removal of the material, which does not include the other trucks needed that remove the material and deposit it at the staging area and bring it back once they are ready to deal with the fill on the west side. Do to the weight limitation on Hwy 1 in that stretch of the road we do not see many dump trucks on this road. Where there are rocks, explosives would be used. Considering that Caltrans never presented a geotechnical analysis how are we assured that the large cut and fill slopes will, in fact, ensure natural landform stability? IP Section 20.500.010 states: Purpose...(2) Assure structural integrity and stability; and (3) Neither create nor contribute significantly to erosion, geologic instability or destruction of the site or surrounding areas,...LUP 3.4-1, and LUP 3.4-9 require hazard information that will assure that there is no bluff erosion, and that the bluff will be preserved. That is lacking.

The Midwest Guardrail System supposedly would be approximately 32 inches tall, too tall for people traveling in a car who want to see the ocean, and not tall enough to keep big trucks from rolling over them. Apparently only minor concrete vegetation control would be placed under the new guard rail. Like most of the information in the Report, Exhibits, and Appendix the environmental concerns are downplayed. Based on the minutes from the BOS hearing Caltrans and the CCC were supposed to

work together to evaluate the safety of alternate railings that would minimize loss of view. What happened? Who dropped the ball? The BOS discussed this issue for a full hour during the appeal hearing. Locals after a 12 year battle with CCC and Caltrans successfully obtained alternative railings for the Fort Bragg Noyo Bridge which has also been used in other places. Why not here? These brown guardrails are ugly. Why can they not be green? Where is the information about alternative railings?

The noise from vehicles driving over the center line rumble strip would disturb the neighbors in an otherwise quiet and idyllic landscape.

How can this project be exempt from environmental review? Is it just because it is labeled a "Safety Project" when indeed it is rather another "Drainage Project" considering that this project includes modifications to eight drainage systems that intersect the highway within the project limits? LUP 3.8-1 requires highway capacity and safety considerations, but that information is lacking. The distance between these projects (post mile 42.3 and 42.35) is minuscule especially considering that the staging area is at post mile 42.4. Is Caltrans proposing to stage excavation of west-facing Navarro Ridge along Nonella Lane, a private street? The Coastal Act does not allow piecemealing.

The drainage systems increase the intensity of concentrated highway corridor runoff discharges to the NPP and cliff, and thereby is destructively eroding its natural landform and affecting the California Coastal National Monument. The deposits of these spoils on the west side of Hwy 1 and on the NPP will impact emergent wetlands. The runoff from the several altered drainages may potentially impact the cliff and rocks of the California Coastal Monument.

This project would permanently block the California Coastal Trail and others on the NPP with a major drainage facility near Post Mile 42.11, and seasonally block or substantially impede the safe use of trails on the Navarro Point Preserve that will be inundated by the numerous project culverts. This is inconsistent with the public access policies of the LCP and the Coastal Act.

No mitigations are designed for the 2-year long project construction period. It would severely influence the local economy, people, and animals. Many people might chose to bypass this area by driving via Flynn Creek Road to Comptche Ukiah Road and vice versa. People on Navarro Ridge Road will also be affected.

The project does not consider the cumulative effect of these two projects, neither the other projects that Caltrans has planned like the Albion River Bridge Replacement/Rehabilitation, Salmon Creek Bridge Replacement, Salmon Creek Sandblast Waste Abatement, the Gualala Downtown Streetscape Enhancement, the Elk Creek Bridge Replacement, Jack Peters Bridge Widening & Rail Upgrade, Hare Creek Bridge Rehabilitation, Fort Bragg's ADA project, and the Pudding Creek Bridge Widening & Rail Upgrade. Caltrans has not obtained an LCP amendment to widen and realign the LCP-mapped roadway/road prism.

The Report proposed 11 conditions of project approval that are, in various parts, ambiguous, inconsistent, incomplete, fail to achieve project compliance with the relevant LCP and Coastal Act standards, and lack a project mitigation monitoring/reporting plan that would set forth the objective standards for project implementation in compliance with the CDP, if the project were otherwise consistent with the LCP/Coastal Act, which it is not.

The appeal before you clearly raises substantial issues of project and County approval inconsistency with the mandatory standards of the Commission-certified local coastal program and the Coastal Act public access and recreation requirements. Feasible and less environmentally damaging alternatives exist to this project. This is an enormous squandering of our unique natural resources, time, and money. The disruption affecting our quality of life is immeasurable.

I am asking you to either remand the case back to the County with appropriate Coastal Act guidance or for you to render a substantive decision that upholds the Coastal Act. It is your obligation to preserve and protect this stunning, beautiful area for generations to come!

I respectfully request Commissioners to specifically address each of my comments on the record before you render a decision on this appeal. Thank you.

Sincerely,

Annemarie Weibel (member Albion Bridge Stewards)  
P.O. Box 566  
Albion, Ca 95410  
aweibel@mcn.org

2-3-2023

**From:** [Carrie Durkee](#)  
**To:** [Leavitt, Amber@Coastal](#); [Krygsman, Vail@Coastal](#); [NorthCoast@Coastal](#)  
**Subject:** 9a. Navarro Safety Project  
**Date:** Tuesday, February 7, 2023 2:47:34 PM

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Hello Commissioners and staff:

I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

I sent this before but neglected to include all the proper emails.

I also sent the original email with the wrong subject title. I originally wrote "Navarro Drainage Project"

Please post on line since I sent the original on Feb. 1.

Thank you for the work you do.

Carrie Durkee

Begin forwarded message:

**From:** Carrie Durkee <[cdurkee@mcn.org](mailto:cdurkee@mcn.org)>  
**Subject:** 9a. Navarro Drainage Project  
**Date:** February 1, 2023 at 8:54:05 AM PST  
**To:** [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov), [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov),  
[Effie.Turnbull-Sanders@coastal.ca.gov](mailto:Effie.Turnbull-Sanders@coastal.ca.gov), [Sara.Aminzadeh@coastal.ca.gov](mailto:Sara.Aminzadeh@coastal.ca.gov),  
[Stephen.padilla@coastal.ca.gov](mailto:Stephen.padilla@coastal.ca.gov), [mike.wilson@coastal.ca.gov](mailto:mike.wilson@coastal.ca.gov),  
[Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov), [Linda.Escalante@coastal.ca.gov](mailto:Linda.Escalante@coastal.ca.gov),  
[Meagan.Harmon@coastal.ca.gov](mailto:Meagan.Harmon@coastal.ca.gov), [Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov),  
[Carole.Groom@coastal.ca.gov](mailto:Carole.Groom@coastal.ca.gov), [ExecutiveStaff@coastal.ca.gov](mailto:ExecutiveStaff@coastal.ca.gov)

Dear Coastal Commissioners and Commission Staff,

I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

You have the power and the opportunity to preserve and protect this stunning beautiful area for generations to come for our common future.

People come from all over the world to visit our art and music festivals, great parks and open spaces, and the fine visitor-serving facilities to experience the magnificent wonders, the highly scenic, fragile, environmentally sensitive, and unique rural Albion Gateway to the Pacific Ocean coast in Mendocino County.

We all support a functional, and safe, coastal highway that conforms to the beautiful and naturally curved landscape, preserves the rare freshwater wetlands, the vital grassland habitat that sustains the Navarro Ridge-Navarro Preserve regional wildlife corridor. Whatever happens in this area needs to be subordinate to this setting.

Thank you for standing up for nature and natural habitats.

Respectfully,

Carrie Durkee



**From:** [Leavitt, Amber@Coastal](mailto:Leavitt.Amber@Coastal)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Subject:** FW: I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.  
**Date:** Tuesday, February 7, 2023 4:02:24 PM

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-----Original Message-----

From: Laurie York <ttfarm@mcn.org>  
Sent: Thursday, February 2, 2023 8:30 AM  
To: Brownsey, Donne@Coastal <donne.brownsey@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Diamond, Francine@Coastal <francine.diamond@coastal.ca.gov>; Mann, Zahirah@Coastal <zahirah.mann@coastal.ca.gov>; Faustinos, Belinda@Coastal <belinda.faustinos@coastal.ca.gov>; Rafel.Mandelman@coastal.ca.gov; Rivas, Rick@Coastal <rick.rivas@coastal.ca.gov>; Aguirre, Paloma@Coastal <paloma.aguirre@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Gray, Shana@Coastal <Shana.Gray@coastal.ca.gov>; Warren, Louise@Coastal <Louise.Warren@coastal.ca.gov>  
Subject: Re: I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

Coastal Commission Meeting 2-10-2023, item # 9a

Dear Coastal Commissioners and Commission Staff,

I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

People come from throughout California, the United States, and the world to visit our art and music festivals, great parks and open spaces, and the fine visitor-serving facilities to experience the magnificent wonders, the highly scenic, fragile, environmentally sensitive, and unique rural Albion Gateway to the Pacific Ocean coast in Mendocino County. It is your obligation to preserve and protect this stunning beautiful area for generations to come.

We all support a functional, and safe, coastal highway that conforms to the beautiful and naturally curved landscape, preserves the rare freshwater wetlands, the vital grassland habitat that sustains the Navarro Ridge-Navarro Preserve regional wildlife corridor. Whatever happens in this area needs to be subordinate to this setting.

For the residents the Navarro Ridge Road-Highway 1 intersection is the only way in and out from our homes. There are proposals for staging areas next to that intersection. The two areas planned are problematic. It would be hard to see the traffic for people who want to access the highway from Navarro Ridge Road. Another one is an area next to the Coastal Trail where many tourists pull over to admire the view.

Highway 1 connects the South Coast to the North Coast and also connects us to inland areas. Safety during construction is of critical importance. Straightening and widening of the two-lane highway has consistently resulted in unmitigated environmental destruction, increased vehicle speeds and resultant collisions, and injuries or death to humans and wildlife.

In order to widen the lanes to a consistent 12 feet and adding two 4-foot paved shoulders the Navarro Ridge bluffs will be denuded of most of the vegetation (reduced buffers for 9 Environmentally Sensitive Habitat Areas (ESHA's), and removal of up to 75 trees. The project does not include measures to assure that the site will be successfully revegetated.

Destructive grading will have major impacts on the scenic quality of the Gateway as seen from along the highway

and from many of the trails on the Preserve. It will effect the Navarro Ridge bluffs and the Navarro Point Preserve to heights of up to 55 feet on the east side, and 16 feet on the west side of the highway. 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, used as fill elsewhere, and transported by filling close to 1,000 trucks. Where there are rocks, explosives would be used. Considering that Caltrans never presented a geotechnical analysis how are we assured that the large cut and fill slopes will, in fact, ensure natural landform stability?

The Midwest Guardrail System supposedly would be approximately 32 inches tall, to tall for people traveling in a car who want to see the ocean. Based on the directions of the Board of Supervisors Caltrans and the CCC were supposed to work together to evaluate the safety of alternate railings that would minimize loss of view. Locals after a 12 year battle successfully obtained alternative railings for the Fort Bragg Noyo Bridge.

Considering that this project includes modifications to eight drainage systems that intersect the highway within the project limits this seems to be rather a drainage project which increases the intensity of concentrated highway corridor runoff discharges to the Navarro Point Preserve and Cliff, and thereby is also destructively eroding its natural landform and effecting the California Coastal National Monument.

This project would permanently block the California Coastal Trail and others on the Preserve with a major drainage facility near Post Mile 42.11, and seasonally block or substantially impede the safe use of trails on the Preserve that will be inundated by the numerous project culverts. No mitigations are designed for the 2-year long project construction period. It would severely influence the local economy, people, and animals. Many people might chose to bypass this area by driving via Flynn Creek Road to Comptche Ukiah Road and vice versa. People on Navarro Ridge Road will also be affected. Why has Caltrans not chosen to inform the community?

The project does not consider the cumulative effect of these two projects, neither the other projects that Caltrans has planned like the Albion River Bridge Replacement/Rehabilitation, Salmon Creek Bridge Replacement, Salmon Creek Sandblast Waste Abatement, the Gualala Downtown Streetscape Enhancement, the Elk Creek Bridge Replacement, Jack Peters Bridge Widening & Rail Upgrade, Hare Creek Bridge Rehabilitation, Fort Bragg's ADA project, and the Pudding Creek Bridge Widening & Rail Upgrade.

The appeal before you clearly raises substantial issues of project and County approval inconsistency with the mandatory standards of the Commission-certified local coastal program and the Coastal Act public access and recreation requirements. Feasible and less environmentally damaging alternatives exist to this Caltrans project. This is an enormous squandering of our unique natural resources, time, and money. The disruption affecting our quality of life is immeasurable.

I respectfully request Commissioners to specifically address each of my comments on the record before you render a decision on this appeal. Thank you.

I am asking you to either remand the case back to the County with appropriate Coastal Act guidance or for you to render a substantive decision that upholds the Coastal Act.

Sincerely,

Carmen Goodyear  
P.O. Box 51  
Albion, CA 95410

**From:** [Leavitt.Amber@Coastal](mailto:Leavitt.Amber@Coastal)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Subject:** FW: Navarro Ridge Safety Project Violates the Coastal Act  
**Date:** Tuesday, February 7, 2023 4:32:46 PM

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----- Forwarded Message -----

**Subject:** Navarro Ridge Safety Project Violates the Coastal Act

**Date:** Sun, 29 Jan 2023 18:45:54 -0800

**From:** kYra Dear <[kyradear@gmail.com](mailto:kyradear@gmail.com)>

**To:** [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov), [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov),  
[Dayna.Bochco@coastal.ca.gov](mailto:Dayna.Bochco@coastal.ca.gov), [Effie.Turnbull-Sanders@coastal.ca.gov](mailto:Effie.Turnbull-Sanders@coastal.ca.gov),  
[Sara.Aminzadeh@coastal.ca.gov](mailto:Sara.Aminzadeh@coastal.ca.gov), [Linda.Escalante@coastal.ca.gov](mailto:Linda.Escalante@coastal.ca.gov),  
[Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov), [Meagan.Harmon@coastal.ca.gov](mailto:Meagan.Harmon@coastal.ca.gov),  
[Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov), [Belinda.Faustinos@coastal.ca.gov](mailto:Belinda.Faustinos@coastal.ca.gov),  
[Rafel.Mandelman@coastal.ca.gov](mailto:Rafel.Mandelman@coastal.ca.gov), [Rick.Rivas@coastal.ca.gov](mailto:Rick.Rivas@coastal.ca.gov),  
[Paloma.Aguirre@coastal.ca.gov](mailto:Paloma.Aguirre@coastal.ca.gov), [Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov),  
[Francine.Diamond@coastal.ca.gov](mailto:Francine.Diamond@coastal.ca.gov), [Zahirah.Mann@coastal.ca.gov](mailto:Zahirah.Mann@coastal.ca.gov),  
Matt.O'Malley@coastal.ca.gov, [John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov),  
[Shana.Gray@coastal.ca.gov](mailto:Shana.Gray@coastal.ca.gov), [Louise.Warren@coastal.ca.gov](mailto:Louise.Warren@coastal.ca.gov)

Dear Coastal Commissioners and Commission Staff,

I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

People come from throughout California, the United States, and the world to visit our art and music festivals, great parks and open spaces, and the fine visitor-serving facilities to experience the magnificent wonders, the highly scenic, fragile, environmentally sensitive, and unique rural Albion Gateway to the Mendocino Coast. It is your obligation to preserve and protect this stunning beautiful area for generations to come.

The local community supports a functional and safe coastal highway that conforms to the beautiful and naturally curved landscape, and most importantly preserves the rare freshwater wetlands, the vital grassland habitat that sustains the Navarro Ridge-Navarro Preserve regional wildlife corridor. Any human developments in this area must remain subordinate to these sensitive ecosystems.

For residents, the Navarro Ridge Road-Highway 1 intersection is the only way into and out from our homes. There are proposals for staging areas next to that intersection. The two areas planned are problematic and the entire project has many troubling issues that include violation of the Coastal Act:

1. **It would block the siteline of oncoming traffic when trying to access the highway from Navarro Ridge Road.**

2. **The staging area will block access to the Coastal Trail where many tourists and locals alike park to admire the view, also blocking other trails on the Preserve with a major drainage facility near Post Mile 42.11**
3. **In order to widen the lanes to a consistent 12 feet and adding two 4-foot paved shoulders the Navarro Ridge bluffs will be denuded of most of the vegetation, reduce buffers for 9 Environmentally Sensitive Habitat Areas (ESHA's), and remove up to 75 trees.**
4. **The project includes modifications to eight drainage systems that intersect the highway increasing the intensity of concentrated highway corridor runoff discharges onto the Navarro Point Preserve and Cliff which will cause erosion, affecting the California Coastal National Monument.**
5. **The project does not include measures to assure that the site will be successfully revegetated.**
6. **Destructive grading will have major impacts on the scenic quality of the Gateway as seen from along the highway and from many of the trails on the Preserve.**
7. **It will negatively impact the Navarro Ridge bluffs and the Navarro Point Preserve to heights of up to 55 feet on the east side, and 16 feet on the west side of the highway.**
8. **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 by close to 1,000 trucks massively increasing traffic, air pollution, and quality of life for locals discouraging tourism that we depend on week by week.**
9. **Where there are rocks, explosives would be used. Considering that Caltrans never presented a geotechnical analysis there is NO ASSURANCE and unlikely that the large cut and fill slopes will, in fact, ensure natural landform stability.**
10. **Straightening and widening of the two-lane highway has consistently resulted in unmitigated environmental destruction, increased vehicle speeds and resultant collisions, injuries and death to humans and wildlife.**
11. **Caltrans has not informed the community of this massively impacting years-long project.**
12. **The Midwest Guardrail System would be approximately 32 inches tall, too tall for people traveling in a car who want to see the ocean.**

Based on the directions of the Board of Supervisors Caltrans and the CCC were supposed to work together to evaluate the safety of alternate railings that would minimize loss of view. Locals after a 12 year battle successfully obtained alternative railings for the Fort Bragg Noyo Bridge. We will pursue this fight against the Navarro Ridge Safety Project until we know for a fact this devastating project is amended with appropriate guidance from the County and the CCC and is in compliance with the Coastal Act.

No mitigations are designed for the 2-year long project construction period. It would severely impact the local economy, people, and wildlife and ecosystems.

The appeal before you clearly raises substantial issues of project and County approval *inconsistency* with the mandatory standards of the Commission-certified local coastal program and the Coastal Act public access and recreation requirements. Feasible and less environmentally damaging alternatives exist

to the Caltrans Navarro Ridge Safety Project. This is an enormous squandering of our unique natural resources, time, and money. The permanent disruptions it will cause to our quality of life are immeasurable.

I respectfully request Commissioners to specifically address each of my comments on the record before you render a decision on this appeal. Remand the case back to the County with appropriate guidance that upholds the Coastal Act.

Sincerely,  
Kyra Rice  
6350 Highway 1  
Little River, CA 95456

Kyra Rice  
ph: 707-841-1155

**From:** [Leavitt, Amber@Coastal](mailto:Leavitt.Amber@Coastal)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Subject:** FW: I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.  
**Date:** Wednesday, February 8, 2023 3:48:13 PM

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----- Forwarded Message -----

**Subject:** I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

**Date:** Thu, 2 Feb 2023 07:58:20 -0800

**From:** Laurie York <[tffarm@mcn.org](mailto:tffarm@mcn.org)>

**To:** [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov), [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov),  
[Dayna.Bochco@coastal.ca.gov](mailto:Dayna.Bochco@coastal.ca.gov), [Effie.Turnbull-Sanders@coastal.ca.gov](mailto:Effie.Turnbull-Sanders@coastal.ca.gov),  
[Sara.Aminzadeh@coastal.ca.gov](mailto:Sara.Aminzadeh@coastal.ca.gov), [Linda.Escalante@coastal.ca.gov](mailto:Linda.Escalante@coastal.ca.gov),  
[Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov), [Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov), [Meagan.Harmon@coastal.ca.gov](mailto:Meagan.Harmon@coastal.ca.gov),  
[Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov), [Francine.Diamond@coastal.ca.gov](mailto:Francine.Diamond@coastal.ca.gov),  
[Zahirah.Mann@coastal.ca.gov](mailto:Zahirah.Mann@coastal.ca.gov), [Belinda.Faustinos@coastal.ca.gov](mailto:Belinda.Faustinos@coastal.ca.gov),  
[Rafel.Mandelman@coastal.ca.gov](mailto:Rafel.Mandelman@coastal.ca.gov), [Rick.Rivas@coastal.ca.gov](mailto:Rick.Rivas@coastal.ca.gov),  
[Paloma.Aguirre@coastal.ca.gov](mailto:Paloma.Aguirre@coastal.ca.gov), [John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov),  
[Shana.Gray@coastal.ca.gov](mailto:Shana.Gray@coastal.ca.gov), [Louise.Warren@coastal.ca.gov](mailto:Louise.Warren@coastal.ca.gov)

Coastal Commission Meeting 2-10-2023, item # 9a

Dear Coastal Commissioners and Commission Staff,

I oppose the Caltrans Navarro Ridge Safety project on Highway 1 in the coastal zone.

People come from throughout California, the United States, and the world to visit our art and music festivals, great parks and open spaces, and the fine visitor-serving facilities to experience the magnificent wonders, the highly scenic, fragile, environmentally sensitive, and unique rural Albion Gateway to the Pacific Ocean coast in Mendocino County. It is your obligation to preserve and protect this stunning beautiful area for generations to come.

We all support a functional, and safe, coastal highway that conforms to the beautiful and naturally curved landscape, preserves the rare freshwater wetlands, the vital grassland habitat that sustains the Navarro Ridge-Navarro Preserve regional wildlife corridor. Whatever happens in this area needs to be subordinate to this setting.

For the residents the Navarro Ridge Road-Highway 1 intersection is the only way in and out from our homes. There are proposals for staging areas next to that intersection. The two areas planned are problematic. It would be hard to see the traffic for people who want to access the highway from Navarro Ridge Road. Another one is an area next to the Coastal Trail where many tourists pull over to admire the view.

Highway 1 connects the South Coast to the North Coast and also connects us to inland areas. Safety

during construction is of critical importance. Straightening and widening of the two-lane highway has consistently resulted in unmitigated environmental destruction, increased vehicle speeds and resultant collisions, and injuries or death to humans and wildlife.

In order to widen the lanes to a consistent 12 feet and adding two 4-foot paved shoulders the Navarro Ridge bluffs will be denuded of most of the vegetation (reduced buffers for 9 Environmentally Sensitive Habitat Areas (ESHA's), and removal of up to 75 trees. The project does not include measures to assure that the site will be successfully revegetated.

Destructive grading will have major impacts on the scenic quality of the Gateway as seen from along the highway and from many of the trails on the Preserve. It will effect the Navarro Ridge bluffs and the Navarro Point Preserve to heights of up to 55 feet on the east side, and 16 feet on the west side of the highway. 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, used as fill elsewhere, and transported by filling close to 1,000 trucks. Where there are rocks, explosives would be used. Considering that Caltrans never presented a geotechnical analysis how are we assured that the large cut and fill slopes will, in fact, ensure natural landform stability?

The Midwest Guardrail System supposedly would be approximately 32 inches tall, to tall for people traveling in a car who want to see the ocean. Based on the directions of the Board of Supervisors Caltrans and the CCC were supposed to work together to evaluate the safety of alternate railings that would minimize loss of view. Locals after a 12 year battle successfully obtained alternative railings for the Fort Bragg Noyo Bridge.

Considering that this project includes modifications to eight drainage systems that intersect the highway within the project limits this seems to be rather a drainage project which increases the intensity of concentrated highway corridor runoff discharges to the Navarro Point Preserve and Cliff, and thereby is also destructively eroding its natural landform and effecting the California Coastal National Monument.

This project would permanently block the California Coastal Trail and others on the Preserve with a major drainage facility near Post Mile 42.11, and seasonally block or substantially impede the safe use of trails on the Preserve that will be inundated by the numerous project culverts. No mitigations are designed for the 2-year long project construction period. It would severely influence the local economy, people, and animals. Many people might chose to bypass this area by driving via Flynn Creek Road to Comptche Ukiah Road and vice versa. People on Navarro Ridge Road will also be affected. Why has Caltrans not chosen to inform the community?

The project does not consider the cumulative effect of these two projects, neither the other projects that Caltrans has planned like the Albion River Bridge Replacement/Rehabilitation, Salmon Creek Bridge Replacement, Salmon Creek Sandblast Waste Abatement, the Gualala Downtown Streetscape Enhancement, the Elk Creek Bridge Replacement, Jack Peters Bridge Widening & Rail Upgrade, Hare Creek Bridge Rehabilitation, Fort Bragg's ADA project, and the Pudding Creek Bridge Widening & Rail Upgrade.

The appeal before you clearly raises substantial issues of project and County approval inconsistency with the mandatory standards of the Commission-certified local coastal program and the Coastal Act public access and recreation requirements. Feasible and less environmentally damaging alternatives exist to this Caltrans project. This is an enormous squandering of our unique natural resources, time, and money. The disruption affecting our quality of life is immeasurable.

I respectfully request Commissioners to specifically address each of my comments on the record before you render a decision on this appeal. Thank you.

I am asking you to either remand the case back to the County with appropriate Coastal Act guidance or for you to render a substantive decision that upholds the Coastal Act.

Sincerely,

Laurie York  
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