

CALIFORNIA COASTAL COMMISSION

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W13a

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STAFF REPORT: REGULAR CALENDAR

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|------------------------------|---|
| Application No.: | 1-25-0828 |
| Applicant: | California Department of Transportation (District 1) |
| Location: | Albion River Bridge, Highway 1 (post mile 43.74) and APN (123-170-01) in Mendocino County |
| Project Description: | Repair and maintenance activities of the Albion River Bridge, including replacing in-kind 53 deteriorated timber scabs and inspecting and potentially replacing as necessary, three split-ring connectors and one mole-claw plate connector at the base of the northern towers all located within the Caltrans right of way on Highway 1, Mendocino County. |
| Staff Recommendation: | Approval with Conditions |

SUMMARY OF STAFF RECOMMENDATION

The California Department of Transportation (Caltrans) proposes repair and maintenance work on the Albion River Bridge located in unincorporated Albion in Mendocino County. The Albion River Bridge is one of the oldest operating highway bridges in the state, and the only one constructed primarily by treated wood. The bridge was constructed using salvaged wood timbers and steel trestle materials in 1944 when wartime necessities restricted access to the materials needed to construct the original concrete arch bridge design. Caltrans has long identified the need to repair, maintain, and potentially replace the bridge. Recent inspections identified deteriorated and/or damaged wood and metal elements of the bridge structure that present a more imminent threat to bridge stability. The proposed repair work will maintain the structural integrity of the bridge and ensure the continued safety of the traveling public at this time.

The project involves maintenance activities include replacing deteriorated timbers and inspecting and replacing as necessary, various connectors on the northern towers of the bridge. All removed timber scabs (timber splice members) and fasteners will be replaced in-kind and will match the existing components in design, color, texture, and materials and will thus preserve the visual character of the bridge. The proposed project before the Commission is only the repair and maintenance activities proposed here and does not go to the bridge itself or any potential approval of a new bridge structure.

The project is anticipated to take 30 working days to complete and will include temporary impacts to public access through lane closures of Highway 1, including up to 20 full nighttime closures. Work will occur between October 2026 to May 1, 2027, thus avoiding high summer recreation season and Special Conditions prevent work closures on weekends or holidays.

The project will also need temporary vehicle access onto ice plant mats underneath the bridge, which are adjacent to sand dunes considered ESHA. Caltrans has adopted various Best Management Practices (BMPs) to avoid and minimize impacts to adjacent ESHA and Special Conditions include further ESHA protections and set limits on access and staging locations.

Staff recommends the Commission find the proposed project, as conditioned, consistent with the water quality, ESHA, public access, and other resource protection policies of the Coastal Act. Staff recommends that the Commission approve coastal development permit application 1-25-0828, as conditioned. The motion to implement this recommendation can be found on **Page 4**.

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I. Motion and Resolution

Coastal Development Permit

A. Motion

I move that the Commission **approve** Coastal Development Permit Application No. 1-25-0828 pursuant to the staff recommendation.

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

B. Resolution

The Commission hereby **approves** Coastal Development Permit Application No. 1-25-0828 for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either (1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or (2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions

This permit is granted subject to the following standard conditions:

- 1. Notice of Receipt and Acknowledgment.** The permit is not valid, and development shall not commence, until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
- 2. Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
- 3. Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
- 4. Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. Special Conditions

This permit is granted subject to the following special conditions:

1. **Other Agency Approvals.** PRIOR TO THE COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit to the Executive Director written evidence that all necessary permits, permissions, approvals, or authorizations for the approved project development have been granted by the North Coast Regional Water Quality Control Board, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife, or evidence that no such authorizations are required for this project. The permittee shall inform the Executive Director of any changes to the project required by any of these other agencies. Any such changes shall not be incorporated into the project until the permittee obtains an amendment to this permit, unless the Executive Director determines that no amendment is legally required.
2. **Evidence of Legal Ability of Applicant to Undertake Development and Comply with Conditions of Approval.** PRIOR TO ISSUANCE OF PERMIT, the permittee shall submit for the review and approval of the Executive Director evidence that clearly demonstrates the legal right, interest, or entitlement to carry out the conditions of approval of CDP 1-25-0828, including but not limited to evidence the permittee has acquired all necessary temporary construction easement(s), fee titles, and/or leases for properties on which the proposed development would be located.
3. **Final Construction Plans.** NOT LESS THAN 30 DAYS PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit for the review and written approval of the Executive Director, final site and construction plans that are consistent with the Project Description ([Exhibit 3](#)) and that substantially conforms with the plans submitted to the Commission in the permit application and which are consistent with all special conditions of this CDP.
 - A. The final plans shall include, at a minimum, the following components:
 - 1) Final engineering and design plans for all improvements.
 - 2) Final specific locations of all construction areas, staging areas, and construction access corridors in site plan view. The plans shall demonstrate that no public parking, roadside parking, or public access areas will be impacted because of construction staging, except for minor, temporary use of parking areas when sufficient parking remains for demand.
 - 3) Equipment staging, materials storage, and stockpiling areas shall be limited to the locations and sizes specified in the final approved

construction plans required herein. Construction vehicles shall be restricted to designated access route identified in [Exhibit 2](#) and on construction plans. Construction equipment and materials shall be stored only in designated staging and stockpiling areas as depicted on the final approved construction plans.

- 4) Final plans shall demonstrate compliance with all special conditions of this CDP as applicable.
- B. The Permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission approved amendment to this CDP unless the Executive Director determines that no amendment is legally required.

4. Project Timing. BY ACCEPTANCE OF THIS PERMIT, the applicant agrees that construction activities that may result in full nighttime closures of Highway 1 shall take place only on Sundays through Thursdays, 9 PM to 5 AM, between October 1, 2026 and May 1, 2027. All construction activities that may result in lane closures will be limited to weekdays (Monday through Friday) and shall not be allowed during weekend days or public holidays. The Executive Director may extend the time periods for work allowed to complete the authorized repair and maintenance activities due to weather delays or may allow for an occasional weekend workday upon a showing of good cause.

5. Road Closure and Emergency Action Plans. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION, the permittee shall submit for the review and approval of the Executive Director: 1) a road closure plan which includes a procedures for providing notice to the public of highway closures and a contingency plan for reopening; and 2) an emergency action plan in coordination with local emergency services including fire and ambulance services as well as general evacuation orders to be implemented during full bridge closures.

6. Construction Responsibilities. BY ACCEPTANCE OF THIS PERMIT, the Permittee shall undertake development in compliance with all conditions of this CDP and with all proposed standard measures and Best Management Practices (BMPs) in [Exhibit 3](#) and [Exhibit 4](#), except as supplemented or modified herein:

- A. **Spill Prevention.** All equipment used during construction shall be free of leaks of fuels and lubricants at all times. Hazardous materials management equipment, including a spill kit, shall be available immediately on-hand at the project site and a registered first-response, professional hazardous materials clean-up/remediation service shall be locally available on call. Any accidental spill shall be rapidly contained and cleaned up. No construction materials, debris, fuels, lubricants, solvents, or waste shall be placed or stored where they may enter sensitive habitat or receiving waters, or be subject to wave or tidal action, erosion, or dispersion. Any and all debris resulting from construction activities shall be removed from the site within

twenty-four (24) hours of completion of construction and disposed of at an appropriate location.

B. **Plastic Netting Prohibition.** Gravel berm bags, fiber rolls, mulch netting or any other sediment or erosion control product used at the project site during construction shall be temporary and free of plastic. Any erosion control associated netting shall be made of loose-weave natural-fiber.

C. **Wood Treatment.** Replacement treated timber scabs shall conform to the specifications of the American Wood Preservation Association Standards for heavy duty use category. Wood treated with Creosote or ACA (Ammoniacal Copper Arsenate) is prohibited.

D. **Pedestrian Access Route Signage.** Pedestrian public access from the campground to the beach shall be allowed at all times during construction. Temporary high visibility fencing shall be installed around the work area under the bridge and temporary signage directing pedestrians along the public access route to the beach shall be installed. Access to the kayak launch area will remain open during construction.

E. **Night Lighting.** Night lighting shall be directed specifically on the portion of the work area under active repair and maintenance and away from sensitive habitat areas to the maximum extent feasible, including the river channel, to minimize potential disturbance to sensitive species and habitats.

F. **Flagging of Biologically Sensitive Areas.** Prior to the commencement of any development, a qualified biologist shall identify with flagging, construction barrier fencing, or other similar temporary means, the boundaries of any Environmentally Sensitive Habitat Areas (ESHA) within and adjacent to the project work areas. Vehicle access and construction equipment staging shall avoid encroachment into identified areas, except as specifically authorized by this CDP. Demarcated areas shall be inspected throughout construction to ensure that they are visible for construction personnel. If the fencing is removed, damaged, or otherwise compromised during the construction period, construction activities shall cease until the fencing is repaired or replaced.

7. **Nesting Bird Protection.** If construction occurs during the bird nesting/breeding season (typically beginning February 1 and ending August 15), a qualified biologist shall conduct surveys for nesting birds along the bridge structure within the project area no more than 5 days prior to the start of construction activities and submit the results of all surveys to the Executive Director. If an active nest is located, a qualified biologist shall consult with the California Department of Fish and Wildlife to establish appropriate buffers and monitoring requirements to ensure avoidance of nesting bird impacts. Construction buffers for active nests shall be no less than 300 feet for nesting raptors and 100 feet for other nesting bird species.

8. **Construction Reporting.** The Permittee shall provide the following reports/surveys:

- A. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION, a pre-construction survey shall be completed to document the condition of the work area, including native species diversity, native species cover, and non-native species cover within the planned work area. Pre-construction photos shall also be taken to show all work areas and the existing topography of the dunes.
- B. WITHIN THREE MONTHS OF CONCLUSION OF CONSTRUCTION, the Permittee shall submit a report documenting all construction activities, including at least a summary of work completed, dates and times of highway closures, any impacts to public access at the campground, and photos from the same locations as above. The report shall also survey the impacted area using the same metrics as above (i.e., native species diversity, native species cover, and non-native species cover) and take photos of dune topography from the same locations as during the pre-construction survey.

The report shall document that no permanent (defined as lasting more than one year from onset of construction) impacts to ESHA occurred, either by driving across dune ESHA or through other construction activities. If the report indicates any permanent impacts to ESHA did occur, the Permittee shall submit a CDP amendment application proposing actions to restore the habitat and provide compensatory mitigation for the identified impacts.

- 9. Disposal of Construction Debris.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the applicant shall provide to the Executive Director the identification and location of legal disposal site(s) proposed for all construction debris to be removed from the project site, and the schedule for debris removal, including treated wood waste and any other debris, waste, and construction materials.
- 10. Liability for Costs and Attorneys' Fees.** By acceptance of this permit, the Applicant/Permittee agrees to reimburse the Coastal Commission in full for all Coastal Commission costs and attorneys' fees (including (1) those charged by the Office of the Attorney General, and (2) any court costs and attorneys' fees that the Coastal Commission may be required by a court to pay) that the Coastal Commission incurs in connection with the defense of any action brought by a party other than the Applicant/Permittee against the Coastal Commission, its officers, employees, agents, successors and assigns challenging the approval or issuance of this CDP. The Coastal Commission retains complete authority to conduct and direct the defense of any such action against the Coastal Commission.

- 11. Minor Changes and Deadline Extensions.** The Permittee shall undertake development in conformance with the terms and conditions of this CDP, including with respect to all Executive Director-approved plans and other materials, which shall also be enforceable components of this CDP. Any proposed project changes, including in terms of changes to identified requirements in each condition, including deadline extensions or modification of work windows, shall either (a) require a CDP amendment, or (b) if the Executive Director determines that no amendment is legally

required, then such changes may be allowed by the Executive Director if such changes: (1) are deemed reasonable and necessary; and (2) do not adversely impact coastal resources.

IV. Findings and Declarations

A. Background and Environmental Setting

This proposed project is located at the mouth of the Albion River in the town of Albion on Highway 1 at post mile 43.70 approximately 15 miles south of the city of Fort Bragg in coastal Mendocino County. The 969-foot-long, two-lane, historic Albion River Bridge provides the only public access crossing of the Albion River from the mouth of the river at the coast to many miles upriver (see [Exhibit 2](#)). The bridge connects Mendocino and Fort Bragg to the north, with Elk and Point Arena to the south. The bridge was constructed using salvaged wood timbers and steel trestle materials in 1944 when wartime necessities restricted access to the materials needed to construct the original concrete arch bridge design. The bridge is immediately adjacent to the Albion River Campground and Marina which was a former mill site during the 1800s.

B. Project Description

The primary purpose of this maintenance project is to repair and maintain the structural integrity of the Albion River Bridge on Highway 1 in the unincorporated community of Albion in Mendocino County. The bridge is over 80 years old, and components of the wooden structure are deteriorating and in need of structural reinforcement for public safety purposes. Caltrans is in the process of finalizing the planning and design for a broader-scale Albion River Bridge Project intended to comprehensively address upgrades and improvements needed for the Albion River crossing at this location. However, the projected construction schedule for that project is years out (the CDP application process has not yet commenced), and in the interim this maintenance project is essential for maintaining bridge structural stability and public safety.

The proposed work includes replacing 53 deteriorated timber scabs, and inspection and possible replacement of three split-ring connectors and one mole claw-plate connector located at the base of the north timber towers at bents 15, 16, 20, and 24 on the north side of the Albion River. The project also includes temporary installation of portable message signs at seven highway junctions to alert the public of night bridge closures during the construction period (See [Exhibit 3](#) for further details).

Timber scabs measure 4 inches by 14 inches and are located throughout the timber towers. Work to replace the timber scabs along the northern towers will take place from the bridge deck using an under-bridge inspection truck or from the catwalk and walking onto the timber members using a climbing harness. Temporary structural supports comprised of either wood or steel or a combination thereof may be used during the inspection and replacement process of timber scabs, split ring and mole claw plate connectors. Truck and trailer with hardware and materials would be used to access the

base of timber towers to remove the existing timber for a visual inspection of three split-ring connectors and one mole claw-plate connector.

Portable lightweight containment systems would be utilized to capture any debris from replacing damaged timber scabs and inspection of the split-ring connectors and mole claw-plate connector. Construction waste, including treated wood waste will be disposed of at an appropriate disposal facility.

This maintenance project is anticipated to take 30 working days and will include up to 20 non-consecutive full bridge night closures. Full bridge closure is necessary to safely replace the deteriorated timber scabs on the towers and connectors at the base of the bridge. Construction will occur between October 1, 2026 and May 1, 2027 and the night closures could occur Sunday through Thursday, from 9:00 PM to 5:00 AM.

Access to the bents underneath the bridge will be provided through the Albion River Campground and Marina. Staging for the project will take place on the bridge deck, highway shoulder located just north of the bridge at the gravel pullout at Albion River North Side Road and at the base of the northern towers within the Caltrans ROW, adjacent to the Albion River Campground and Marina ([Exhibit 2](#)).

C. Standard of Review

Portions of the proposed project are located within the Coastal Commission's retained CDP jurisdiction and within the County of Mendocino's LCP jurisdiction. Under Coastal Act Section 30601.3, when a project requires a CDP from both a local government with a certified local coastal program and the Commission, the Commission may process a consolidated CDP application for the proposed development when the applicant, the local government, and the Commission's Executive Director agree to process the CDP as a consolidated CDP. In this case, the Mendocino County Board of Directors adopted a resolution (Resolution No. 22-036) authorizing a consolidated coastal development permitting process on February 8, 2022. Caltrans provided a copy of the resolution to Commission staff with the subject CDP application and requested a consolidation process as well, and the Commission's Executive Director agreed to the consolidation. The standard of review for a consolidated CDP is the Chapter 3 policies of the Coastal Act; and the County's LCP may be used as guidance.

D. Other Agency Approvals and Consultations

The project requires authorization from one other agency, as detailed below. To ensure that the project ultimately approved by these other agencies is the same as the project authorized herein, the Commission attaches **Special Condition 1**, which requires the applicant to submit to the Executive Director evidence of these agencies' approvals of the project prior to commencement of construction.

North Coast Regional Water Quality Control Board

Due to the potential to affect water quality, Caltrans will be obtaining a Conditional Waiver of Waste Discharge Requirements. A Notice of Intent to comply with the waiver

was submitted on October 20, 2025, to the North Coast Regional Water Quality Control Board, and approval of the Notice of Applicability is pending.

E. Legal Interests in Subject Property

Section 30601.5 of the Coastal Act requires the following:

Where the applicant for a coastal development permit is not the owner of a fee interest in the property on which a proposed development is to be located, but can demonstrate a legal right, interest, or other entitlement to use the property for the proposed development, the commission shall not require the holder or owner of any superior interest in the property to join the applicant as co-applicant. All holders or owners of any other interests of record in the affected property shall be notified in writing of the permit application and invited to join as co-applicant. In addition, prior to the issuance of a coastal development permit, the applicant shall demonstrate the authority to comply with all conditions of approval.

The proposed maintenance project requires access through the adjoining property, the Albion River Campground (APN: 123-170-01). In compliance with Section 30601.5, Caltrans has provided documentation that the property owner has been notified of the project application and has invited the property owner to join as co-applicant.

Caltrans has secured a Possession and Use Agreement and a temporary construction easement (TCE) with the Albion River Campground to access the roadway through the campground and undertake the work under the bridge. **Special Condition 2** requires Caltrans to submit evidence prior to issuance of this permit that they are authorized to carry out the project as conditioned in this approval of CDP 1-25-0828.

F. Permit Authority for Repair and Maintenance

Section 30610 of the Coastal Act provides, in relevant part:

Notwithstanding any other provision of this division, no coastal development permit shall be required pursuant to this chapter for the following types of development and in the following areas: ...

(d) Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities; provided, however, that if the commission determines that certain extraordinary methods of repair and maintenance involve a risk of substantial adverse environmental impact, it shall, by regulation, require that a permit be obtained pursuant to this chapter.

Although Coastal Act Section 30610(d) generally exempts from Coastal Act permitting requirements repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities, the Commission retains authority to require CDP review over certain extraordinary methods of repair and maintenance that involve a risk of substantial adverse environmental

impact, as enumerated in Section 13252 of the Commission regulations. Section 13252 specifies, in relevant part:

- (a) For purposes of Public Resources Code Section 30610(d), the following extraordinary methods of repair and maintenance shall require a coastal development permit because they involve a risk of substantial adverse environmental impact:
 - ...
 - 3) Any repair or maintenance to facilities or structures or work located in an environmentally sensitive habitat area, any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams that include: (A) The placement or removal, whether temporary or permanent, of rip-rap, rocks, sand or other beach materials or any other forms of solid materials; (B) The presence, whether temporary or permanent, of mechanized equipment or construction materials. ...

In this case, the timber replacement and connector inspection work would include work adjacent to environmentally sensitive dune habitat areas (ESHA) and coastal waters, and the work involves the placement of “solid materials” and use of “mechanized equipment and construction materials.” The construction work will also temporarily impact public access. Therefore, the repair and maintenance activities here do require a CDP approval, however the CDP approval only goes to the proposed repair and maintenance activities, not to the underlying structure itself.

The evaluation of the consistency of the project with Coastal Act policies is affected by whether the project qualifies as a repair and maintenance activity to an existing structure, rather than a proposal for a new structure. When considering a permit application for an extraordinary method of repair or maintenance, all of which are identified in section 13252 of the Commission’s regulations, noted above, the Commission reviews whether the proposed method of repair or maintenance is consistent with the Chapter 3 policies of the Coastal Act (e.g. least environmentally damaging alternative), rather than the existing underlying structure itself. Primarily, the Commission’s evaluation of such repair and maintenance projects does not extend to an evaluation of whether the existing development conforms to the Coastal Act.

The proposed repair and maintenance activities here include replacing deteriorated timber scabs and inspecting and potential replacing of at least three split-ring connectors and one mole claw-plate connector. These are repair and maintenance activities under Section 30610 because the project replaces existing timbers and connectors in an existing standalone roadway structure and does not involve replacing more than 50 percent of the structure. The project does not include any new structures as part of the roadway or expand or enlarge any existing structures.

If not properly undertaken with feasible mitigation, the necessary methods of the bridge repair activities could have adverse impacts on coastal resources, including ESHA. As such, the applicable provisions of the Coastal Act cited below require that the method of

proposed repair and maintenance activities: (1) use the least environmentally damaging feasible alternative; (2) provide feasible mitigation measures to minimize adverse environmental effects; (3) protect the biological productivity and the quality of coastal waters; and (4) protect environmentally sensitive habitat areas against any significant disruption of habitat values. The project's proposed repair and maintenance activities and the consistency of that work with these Coastal Act provisions are discussed in the respective sections below.

G. Environmentally Sensitive Habitat Area

Section 30240 of the Coastal Act states:

- a. Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- b. Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The Coastal Act defines environmentally sensitive habitat areas (ESHAs) as areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments (Section 30107.5).

In this case, as discussed above, the proposed bridge repairs qualify as repair and maintenance activities. In considering a permit application for a repair or maintenance project pursuant to the above-cited authority, the Commission's review is limited to whether the proposed method of repair or maintenance is consistent with the Chapter 3 policies of the Coastal Act. The Commission's evaluation of such repair and maintenance projects does not extend to an evaluation of the conformity with the Coastal Act of the underlying existing development, in this case, the bridge itself. The Commission does consider alternatives with respect to repair and maintenance activities and mitigation measures, which are discussed below.

Caltrans biologists completed biological surveys of the project site to identify existing habitat types and determine the potential for sensitive species and habitats within and around the work area and a summary is included in [Exhibit 4](#). Construction staging areas for the proposed maintenance project are proposed to occur on previously developed sites (i.e., road prism and/or fill), areas dominated by nonnative annual grasslands (dominated by species such as velvet grass [*Holcus lanatus*], rat-tail fescue [*Festuca myuros*], and rattlesnake grass [*Briza maxima*]), and areas directly below and adjacent to the bridge, classified as ice plant mat (*Carpobrotus edulis*). The ice plant mats on the east side of the bridge are underlain by wood chips with bridge spoils which are remnants of when the bridge was originally constructed in 1942.

Natural communities identified adjacent to the project footprint (within a 100-foot buffer area around the project footprint) include *Baccharis pilularis* (coyote brush scrub) Shrubland Alliance, *Carpobrotus edulis* (ice plant mats) or Other Ice Plants Semi-Natural Herbaceous Stands, *Eucalyptus (globulus, camaldulensis)* (eucalyptus groves) Semi-Natural Woodland Stands, and *Rubus (parviflorus, spectabilis, ursinus)* (coastal brambles) Shrubland Alliance. Only the latter is classified as a sensitive natural community.

No impacts to riparian habitat would occur as the proposed maintenance activities would not require any work within the river. All other access and staging would be from the bridge deck and developed areas within the campground and/or along SR 1. Additionally, standard construction stormwater and water quality BMPs are proposed to be implemented to protect water quality.

ESHA Impacts

Dune ESHA

While the dunes underneath and immediately west the Albion River Bridge are covered by invasive ice plant mats (*Carpobrotus edulis*) as described in Caltrans' *Updated to Biological Review Memo*, they can still be considered ESHA, which is protected under Section 30240 of the Coastal Act. Coastal dunes are recognized by a combination of their position near the coast, sandy substrate, undulating topography, and indicative vegetation, the latter of which may include invasive species like ice plant. The loss and degradation of coastal dunes throughout the state warrants their recognition as categorically rare and especially valuable habitat, though with some effort, they can often be readily restored.

As described above, the duration of construction-related impacts is anticipated to be 30 working days and will therefore be temporary and limited. Furthermore, work at the base of the towers is limited to inspection activities and potential replacement of four total connectors and vehicle access will be directly east of the towers within the ROW. Although a vehicle with trailer will drive onto ice plant mats to access the base of the tower bents, no resulting ground disturbance to the adjacent dunes is anticipated.

Caltrans has adopted a number of BMPs to avoid impacts to ESHA in the project area, and Special Condition 6 reinforces those BMPs. Additionally, **Special Condition 6F** ensures that prior to commencement of development, a qualified biologist will identify with flagging, construction barrier fencing, or other similar temporary means, the boundaries of any ESHA in and immediately around project work areas. Construction equipment staging and stockpiling shall avoid encroachment into identified areas except as specifically authorized by this CDP. Demarcated areas shall be inspected throughout construction to ensure that they are visible for construction personnel. If the fencing is removed, damaged, or otherwise compromised during the construction period, construction activities shall cease until the fencing is repaired or replaced. **Special Condition 8** requires post-construction reporting, including that no permanent impacts to ESHA have occurred.

Coastal Bramble ESHA

Rubus (parviflorus, spectabilis, ursinus) (coastal brambles) Shrubland Alliance (G4, S3) which is classified as a sensitive natural community (i.e., Global Rank 3 [G3] or State Rank 3 [S3]) as defined in A Manual of California Vegetation 2nd edition and CDFW's List of Vegetation Alliances and Associations, was identified adjacent to the construction area underneath the bridge. Because no access would be needed within areas identified as coastal brambles, no sensitive vegetation communities would be altered; thus, no impacts are anticipated. To ensure protection of these adjacent sensitive communities, Caltrans has included multiple BMPs, where are reinforced by **Special Condition 6**, and **Special Condition 6F** requires Caltrans to identify sensitive areas on project plans, as well as in the field, and prohibit access to these areas.

Nesting Birds

Various bird species have the potential to be present in the project area for nesting during the proposed construction, although the proposed anticipated start date of October 1, 2026 begins after nesting bird season ends (typically September 15). As previously discussed, if construction extends into nesting bird season, the project is not expected to significantly disrupt nesting bird habitat because Caltrans proposes a number of minimization and avoidance measures (see [Exhibit 4](#)) including having a qualified biologist conduct preconstruction nesting bird surveys if activities must occur during breeding season. To ensure these measures are implemented as proposed, **Special Conditions 6** and **7** require adherence to the BMPS and limits activities during the nesting season by establishing construction buffers as applicable if nests are discovered.

Night Work Lighting

The proposed project includes up to 20 days of non-consecutive night work and will require lighting for safety. Night lighting has the potential to impact sensitive species and their habitats. In this case, use of night lighting will be temporary, for short periods, and is proposed to be restricted to the minimum level necessary for worker safety and for conducting the necessary work during nighttime hours. To minimize the potential for impacts from night lighting on sensitive species and habitats, including the active channel of the Albion River, Caltrans proposes, and **Special Condition 6** reinforces, measures to minimize these potential impacts by requiring that artificial lighting be directed specifically on the portion of the project area actively under construction and away from sensitive areas to the maximum extent feasible. With these measures, the temporary use of night lighting is not expected to significantly degrade ESHA within or around the project work areas.

Consistency

Altogether, as conditioned, the repair and maintenance project complies with Section 30240(a) and Section 30240(b) of the Coastal Act, because the methods of work as conditioned will minimize potential impacts to ESHA and ensure that any ESHA temporarily impacted by project activities is fully restored to pre-project conditions. Along with the measures and special conditions mentioned above, Caltrans will

implement standard measures and BMPs as identified in Caltrans' Standard Specifications and four project specific measures (SM-1 to SM-4) identified in the *Update to Biological Review Memo* ([Exhibit 4](#)) which would prevent equipment leakage and protect water quality, protect migratory and non-game nesting birds, limit artificial lighting to the active work area and away from sensitive habitat to avoid potential impacts to sensitive biological resources, and prevent the spread of invasive non-native plant species. Sensitive natural communities will be identified on construction plans and flagged in the field and access in these areas will be prohibited. No work will occur within the Albion River or its riverbanks. In order to avoid potential impacts to dune habitat, **Special Condition 6** outlines construction-related requirements to provide for the safe storage of construction materials and the proper disposal of construction debris. Additionally, **Special Conditions 6 and 9** require that all construction debris, including treated wood waste, be disposed of at an appropriate disposal facility.

H. Marine Resources and Water Quality

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of wastewater discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with the surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30232 of the Coastal Act states:

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

The proposed maintenance project will replace 53 deteriorated timber scabs (as previously described, timber scabs measure 4 inches by 14 inches and are located throughout the north timber towers) and inspect and possibly replace various connectors that are elements of the Albion River Bridge structure located at the base of the northern towers adjacent to the Albion River. As such, the maintenance project has the potential to impact water quality if appropriate mitigation measures are not properly implemented.

As proposed, all work will take place from either the bridge deck, the catwalk, or from underneath the bridge on the north side of the Albion River channel, and there will be no work occurring within the flowing waters of the river or directly along its banks. Timber scabs will be accessed via the bridge deck or catwalk, while the connectors will be accessed from the base of the bridge bents through the adjacent Albion River

Campground and Marina. A site figure identifying the location of north tower bents and proposed activities is included in the project description ([Exhibit 3](#)), and site photos showing the location of the northern towers is provided in [Exhibit 2](#).

Timber scab debris has the potential to fall underneath the bridge or the adjacent river during maintenance activities. However, because the work is small scale, any potential debris during timber replacement will most likely be contained by the platform of the under-bridge inspection truck. Any debris resulting from split ring connector or mole-claw plate inspections will be contained by the articulating boom man lift used to access the inspection locations. In both cases, the platform on which construction workers are standing will capture anything that falls, thus ensuring no construction debris discharges into the coastal environment below.

The project proposes to replace deteriorated treated timber scabs in-kind with new treated timber scabs of the same size. In order to ensure that treated wood replacement is the least environmentally damaging type of material for this sensitive coastal environment, Commission attaches **Special Condition 6C**, which prohibits the use of Creosote or ammoniacal copper arsenate treated wood. These types of chemical treatments are known to have adverse impacts on water and sediment quality and can be toxic to aquatic organisms.

To minimize any potential runoff during construction at the base of the timber towers, Caltrans proposes to implement erosion and runoff control BMPs, such as placement of gravel berm bags, straw wattles, silt fencing or a combination thereof around the active construction area at the base of the tower bents. To ensure that the project as implemented prevents impacts that could adversely affect marine resources and water quality, **Special Condition 6** includes requirements that Caltrans adhere to the proposed BMPs.

Additionally, **Special Condition 6B** minimizes the potential for wildlife entanglement and the potential for plastic materials used in the project to flake or break off and discharge into the marine and coastal environment. This condition requires that erosion control products used at the project site, be free of plastic materials, and any erosion control netting used should be loose-weave natural-fiber netting.

To further protect water quality, **Special Condition 6A** prohibits the placement and storage of construction materials, fuels, lubricants, debris or waste in areas subject to tidal action, erosion or dispersion; and requires a spill kit to be readily available on site in the event of an accidental hazardous material spill. Project-related waste materials (e.g., treated wood waste) could also adversely affect coastal waters if not disposed of at authorized upland locations. **Special Condition 9** requires that all construction debris and hazardous waste be removed from the site and disposed of at an appropriate disposal facility.

Thus, as conditioned, the Albion River Bridge repair and maintenance project will be carried out in a manner that will protect coastal waters and minimize potential impacts to water quality, consistent with Section 30231 and 30232.

I. Visual Resources

Section 30251 of the Coastal Act states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views 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. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting. The project site is located in a designated highly scenic area (HSA) under the Mendocino County LCP. The Coastal Act requires that new development in designated HSAs be subordinate to the character of its setting. The surrounding setting is described in part in the certified LUP (section 4.9):

Approaching from the north, motorists see one of the coast's most striking townscapes: a wood trestle bridge in the foreground of a small village that clings to the edge of the hill. This village is composed of two segments—the cluster of dwellings off Albion Ridge Road and the group of buildings on Albion-Airport Road north of the bridgehead.

Although not the standard of review, the County's certified LUP includes the following policy applicable to development in Albion (Policy 4.9-2):

In order to maintain the special community character, building permits shall require that building materials, color and architectural forms of new structures exposed to public view be similar to those existing buildings. Existing buildings shall not be remodeled in a manner that would detract from their historic character.

As previously discussed, construction related equipment and materials placed in the area, including road closure signage, will be short term and temporary and would not result in significant impacts to visual resources.

All removed timber scabs and fasteners will be replaced in-kind and will match the existing components in design, color, texture, and materials and conform to construction specification submitted with the application and reenforced through **Special Condition 3**. Timber scabs are roughly 4" by 14" in size and thus only minor elements of the bridge that do not significantly affect the bridge's overall wooden tower features. These minor replacement elements will not alter the historic character of the bridge and will not have any permanent impacts to visual resources or affect a change to Highway 1's scenic or rural character and are compatible with and subordinate to the existing highway setting.

The proposed repair and maintenance project will maintain existing scenic views along the project area. All replaced timber scabs and fasteners will be replaced in kind and will

thus preserve the visual character of the bridge and is consistent with consistent with Coastal Act Section 30251.

J. Public Access and Recreation

Coastal Act Section 30210 states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Coastal Act Section 30214 states in part:

The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following: (1) Topographic and geologic site characteristics. (2) The capacity of the site to sustain use and at what level of intensity. (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses. (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

Section 30210 of the Coastal Act requires that maximum public access shall be provided and other public access policies of the Coastal Act protect public access consistent with public safety and site characteristics, as well as private property rights. Section 30214 of the Coastal Act provides that the public access policies of the Coastal Act shall be implemented in a manner that takes into account the capacity of the site and the fragility of natural resources in the area. In evaluating project consistency with the public access policies of the Coastal Act, the Commission must consider whether public access is necessary to avoid or offset a project's adverse impact on existing or potential access.

Highway 1 is the major public access route providing access to and along the coast and ocean within the project area. Public access is currently available to the shoreline and beach at Albion Cove beneath the Albion River Bridge via an access road (Albion River North Side Road) which connects from the highway through the privately-owned visitor-serving Albion River Campground and Marina.

As mentioned above, the proposed project is a repair and maintenance project, and the sole purpose is to improve public safety by maintaining the structural integrity of the 80-year-old bridge and thus improving public access up and down the coast along Highway 1. The proposed maintenance work is anticipated to take 30 work-days to complete, and completion of the necessary maintenance work on structural elements necessitates up

to 20 non-consecutive full bridge closures during nighttime hours (9:00 PM to 5:00 AM Sunday through Thursday). None of the proposed maintenance activities require the closure of any nearby visitor and recreational facilities, such as but not limited to the Albion River Inn, Albion River Campground, or Schooner's Landing Campground and Marina. Construction will take place between the period of October 1, 2026 to May 1, 2027 to avoid popular summer travel times and the peak camping season, thereby minimizing impacts to public access and recreation. Ultimately, the number of construction working days is dependent on weather, and work activities may be delayed during unfavorable weather conditions such as high winds and heavy rain. **Special Condition 4** requires Caltrans to adhere to this proposed construction timing to minimize public access impacts.

A road closure plan will be required and implemented to alert residents and the community at large and to ensure a contingency plan is in place for highway reopening. The traveling public will be alerted of any road closures in advance using portable changeable message signs at seven roadway junctions including Routes 1 and 20 in Fort Bragg, Routes 1 and 271 in Leggett, Routes 1 and 128 near Navarro Head, Route 20 and South Main Street in Willits, Route 253 and South State Street in Ukiah, and Route 128 and North Cloverdale Boulevard in Cloverdale as described in . Additionally, Caltrans will send out road closure alerts through their road closure system, press releases and social media posts. To ensure the traveling public is notified and public access impacts are minimized, **Special Condition 5** requires submittal and implementation of a final Road Closure Plan prior to construction which outlines bridge closure notifications and a contingency plan for bridge reopening.

During full bridge closures, an emergency action plan would be implemented in coordination with local emergency services. This plan would involve fire and ambulance services to ensure safe passage or transport across the bridge or via air ambulance, if necessary. If necessary, a partnership with the California Highway Patrol would also be utilized during highway closures to enhance safety in the construction zone. To ensure emergency access can be provided during closures, **Special 5** also requires submittal of an Emergency Action Plan prior to construction.

Temporary high visibility fencing will be installed for the work area under the bridge and around the existing septic tank/pump chamber at the Albion River Campground. To minimize any potential impacts to pedestrian public access, Caltrans will install a public access route outside of the work area, to direct the public from the campground to the beach as noted on construction site plans. Additionally, pedestrian access signs would be displayed on a combination of construction areas signs and barricades. Access to the kayak launch area located along the Albion River will not be impacted and will remain open during construction. **Special Condition 6** ensures that pedestrian access will be maintained here.

Therefore, the proposed project does not have any significant impacts on public access, and the project as conditioned is consistent with the public access policies of the Coastal Act.

K. Archaeological and Tribal Cultural Resources

Section 30244 of the Coastal Act states:

Where development would adversely impact archeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The area surrounding the Albion River contains both prehistoric and historic archaeological resources. The area was originally inhabited by the Northern Pomo.

The Albion River Bridge is listed on the National Register of Historic Places. The bridge is a rare example of a timber deck over combination steel and timber truss bridge and is the only surviving bridge of its type in the California state highway system. Caltrans completed a Secretary of Interior's Standards Action Plan for the Treatment of Historic Properties for the proposed maintenance project in 2021 and concluded that the project would have no adverse effect with Standard Conditions.

This repair and maintenance project does not include any ground disturbance. Caltrans determined that the project would have no effect on archeological resources and tribal consultation was not initiated. Pursuant to the Commission's adopted Tribal Consultation Policy, Commission staff reached out to tribal representatives known from consultation efforts for previous nearby projects and tribal contacts from the most recent Native American Heritage Commission recommended contact list. Staff provided an introduction to the project and the opportunity for comments and recommendations on the project. The Sherwood Valley Band of Pomo Indians reached out to Commission staff to discuss project details, and staff discussed the project with them. To date, Commission staff have not received any other responses from Tribes regarding the subject project.

In conclusion, the proposed project protects archaeological or paleontological resources consistent with Coastal Act Section 30244.

L. Other

Reimbursement of Costs & Fees

Coastal Act Section 30620(c)(1) authorizes the Commission to require applicants to reimburse the Commission for expenses incurred in processing CDP applications. See also 14 C.C.R. § 13055(g). Thus, the Commission is authorized to require reimbursement for expenses incurred in defending its action on the pending CDP application. Therefore, consistent with Section 30620(c), the Commission imposes **Special Condition 10**, requiring reimbursement of specified costs and attorneys' fees the Commission incurs in connection with the defense of any action brought by a party other than the Applicant/Permittee challenging the approval or issuance of this permit.

Minor Changes

Although a great deal of thought and planning has gone into the proposed project, including as it is affected by CDP terms and conditions, oftentimes minor unforeseen issues present themselves in complicated projects of this nature, particularly as construction gets underway, and it is important that the CDP is nimble enough to account for potential minor changes. Thus, minor adjustments to special condition requirements that do not require a CDP amendment or a new CDP (as determined by the Executive Director) may be allowed by the Executive Director if such adjustments: (1) are deemed reasonable and necessary; and (2) do not adversely impact coastal resources (**Special Condition 11**).

M. California Environmental Quality Act (CEQA)

Caltrans serves as lead agency for this project for CEQA review and has determined that the project is Categorically Exempt [14 CCR 15300 et. seq.]. Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

As discussed above, the proposed project has been conditioned to be consistent with the policies of the Coastal Act. As specifically discussed in these above findings, incorporated herein, mitigation measures that will minimize or avoid all significant adverse environmental impacts have been required. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative, has no remaining significant environmental effects, either individual or cumulative, and complies with the applicable requirements of the Coastal Act to conform to CEQA.

APPENDIX A: SUBSTANTIVE FILE DOCUMENTS

1. Application file for CDP Application File No. 1-25-0828
2. Policies and standards of the Mendocino County certified LCP