

Chapter 4 Comments and Coordination

Early and continuing coordination with the general public and public agencies is an essential part of the environmental process. It helps planners determine the necessary scope of environmental documentation and the level of analysis required, and to identify potential impacts and avoidance, minimization, and/or mitigation measures and related environmental requirements. Agency consultation and public participation for this project has occurred through a variety of formal and informal methods, including Project Development Team (PDT) meetings, interagency coordination meetings, one public scoping meeting, and open house/informational meetings.

This chapter summarizes the results of Caltrans' efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

4.1 Scoping Process

4.1.1 Notice of Preparation

On March 17, 2014, an NOP (see Figure 4-1) for a Draft EIR was distributed to the State Clearinghouse; elected officials; local, regional, and state agencies; and public stakeholders (Caltrans 2014c) in accordance with CEQA Guidelines Section 15082. The NOP was also posted on the Caltrans District 4 website.

Two flyers were distributed (on March 7 and 24, 2014) to approximately 600 residents and stakeholders in the proposed project vicinity. The mailing list for the flyers included nearby property owners, elected officials and public agencies, various local government agencies, special interest organizations, and neighborhood groups. Letters were sent to local and regional elected officials on March 18, 2014. A display advertisement announcing the scoping period and the public scoping meeting was posted in the *Santa Rosa Press Democrat* on Sunday, March 23, 2014. Caltrans provided a mailing address and email address for members of the public wanting a copy of the NOP and for submittal of comments on the proposed project (Caltrans 2014c).

4.1.2 Scoping Meeting

In accordance with CEQA Guidelines Section 15802 and NEPA (42 USC 4321), a project scoping meeting was held in Sonoma County within the county of the proposed project. A notice of the scoping meeting was provided in the NOP. The project scoping meeting was held on Wednesday March 26, 2014 from 6:00 PM to 8:00 PM at Grange Hall #777 (1370 Bodega Bay Avenue in Bodega Bay). Caltrans

announced the scoping meeting by publishing a public notice in the *Santa Rosa Press Democrat* on Sunday, March 23, 2014. The meeting was held to provide information regarding the project and to discuss and record any comments from community members regarding the proposed project.

A Public Attendee Observation Tally Sheet was completed by Caltrans staff for the scoping meeting, which shows statistical data on the people attending. Observation on gender, ethnicity, disabilities, and age were made and documented. Based on information recorded on the tally sheet, 29 people attended the meeting (8 females and 21 males, of which 1 was of Asian/Pacific Island ethnicity, 2 were Hispanic ethnicity, and 26 were White [not-Hispanic ethnicity]). No attendees had a physical disability. All attendees were over the age of 40 (Caltrans 2014c).

The scoping meeting was organized in an open house format, with informational stations displaying exhibit boards staffed by representatives from Caltrans. A brief presentation was given by Caltrans regarding the proposed project and how the Coastal Erosion Study (Caltrans 2014g) was conducted. Comment sheets were distributed at the meeting and the public was given the opportunity to submit comment cards at the meeting, fill them out later and mail to the address listed on the card, or to submit via email.

Twenty-six comments were submitted at the meeting, by mail, or by email. The following is a list of the key issues raised during the scoping period. Copies of all comments submitted are provided in the Scoping Comment Sheets and emails section of the Project Scoping Summary Report (Caltrans 2014):

- Visual impact of the project
- Access to houses on Old Highway 1, and issue of public parking
- Extension of lots to the new Highway 1 location
- Consideration of farmland impacts
- Restoration of Scotty Creek ahead of the new roadway and bridge construction
- Public access to Gleason beach and design of the public access
- Consideration of a shorter bridge design
- Impacts to plant and animal species, specifically harbor seal colonies
- No adequate public outreach, and request for a second scoping meeting
- Historic properties
- Impacts to recreation, specifically surfing



Gleason Beach Highway 1 Realignment Project

SCH Number: 2011022002

Document Type: NOP - Notice of Preparation

Alternate Title: Gleason Beach Roadway Realignment Project

Project Lead Agency: Caltrans #4

Project Description

The project proposes to realign a 3,030-3,800 foot, two-lane section of Highway 1, approximately 400 ft inland of the current alignment at Gleason Beach. At the current rate of coastal retreat, it is expected that the 87 ft section of roadway at Gleason Beach abutting the coastal bluffs will be undermined within five years. The purpose of the project is to provide a safe transportation facility that is no longer vulnerable to advancing coastal erosion. Current design alternatives include the construction of a bridge where the proposed realignment crosses the Scotty Creek floodplain. The proposed length of the bridge varies between 750-900 ft.

Contact Information

Primary Contact:

Valerie Shearer
California Department of Transportation, District 4
(510) 286-5594
PO Box 23660, MS-8B
Oakland, CA 94623-0660

Project Location

County: Sonoma
City:
Region:
Cross Streets: Highway 1
Latitude/Longitude: 38° 22' 30" / 127° 07' 30" [Map](#)
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: City/Nearest Community: Jenner and Bodega Bay

Proximity To

Highways: SR 1
Airports:
Railways:
Waterways: Scotty Creek, Pacific Ocean
Schools:
Land Use: Transportation / Agricultural

Development Type

Transportation: Other (Realign roadway)

Local Action

Project Issues

Agricultural Land, Archaeologic-Historic, Coastal Zone, Flood Plain/Flooding, Geologic/Seismic, Recreation/Parks, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Cumulative Effects, Biological Resources, Aesthetic/Visual, Drainage/Absorption, Soil Erosion/Compaction/Grading, Landuse

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Department of Conservation; Central Valley Flood Protection Board; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 3; Office of Emergency Services, California; **Native American Heritage Commission**; Public Utilities Commission; California Highway Patrol; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 1

Date Received: 3/17/2014 **Start of Review:** 3/17/2014 **End of Review:** 4/15/2014

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- California Coastal Trail access and bike access
- Proposed walkway too close to private residences

4.2 Consultation and Coordination with Public Agencies

Consultation with several agencies occurred during the environmental evaluation process. The following federal, state, regional, and local agencies were consulted prior to issuance of the NOP, and during preparation of the EIR/EA and technical reports. Table 4-1 provides a list of meetings conducted thus far with local elected officials and public agency staff members.

Table 4-1 Agency Coordination Meetings and Contacts

Organization	Date	Topic
U.S. Army Corps of Engineers (USACE)	September 2009	Conducted wetland delineation for the biological study area.
U.S. Fish and Wildlife Service (USFWS)	September and October 2009	Correspondence requesting and receiving technical assistance on species to consider in the analysis and consultation.
California Coastal Commission (CCC) and Sonoma County	September 2, 2009	Discussion of preliminary plans for the proposed project.
USFWS and National Marine Fisheries Service (NMFS)	October 23, 2009	Technical assistance; initial site visit and assessment with the agencies; discussed using the National Resources Conservation Service restoration project on Scotty Creek as mitigation for project impacts.
USFWS and NMFS	November 23, 2009	Agency representatives agreed that removing the two double-box culverts at Scotty Creek and replacing them with a free-span bridge with piles would be the most beneficial to salmonids and generally to other species that currently use or historically used the creek.
CCC and Sonoma County	January 27, 2010	Site visit to discuss coastal permitting issues, including coastal wetland delineation, mitigation, and access to beach.
Natural Resources Conservation Service (NRCS)	February 10, 2010	Discussed the Scotty Creek riparian restoration project and how Caltrans can help NRCS.
USACE	February 11, 2010	Site visit to go over wetland delineation details.
NRCS, Gold Ridge Resource Conservation District	March 15, 2010	Discussed a potential mitigation project at Scotty Creek.

Table 4-1 Agency Coordination Meetings and Contacts

Organization	Date	Topic
California Department of Fish and Wildlife (CDFW), and CalFish	June 3–14, 2010	Correspondence regarding fish passage assessment requirements for Scotty Creek and the presence of steelhead in Scotty Creek.
USACE	August 4, 2010	Jurisdictional Determination verification.
NMFS	January 20, 2011	Field meeting to familiarize NMFS with the project site and alternatives prior to the interagency meeting.
Interagency (CCC, Sonoma County, Sonoma Coast State Parks)	February 11, 2011	Interagency meeting to discuss project description, alignment and alternatives.
CCC and Sonoma County	February 18, 2011	Meeting to discuss alternative analysis and permitting issues.
USACE and NMFS	February 23, 2011	Discuss project scoping.
NRCS, NMFS, CDFW, Regional Water Quality Control Board (RWQCB), CCC, USFWS, State Parks, and Sonoma County	December 6, 2011	Interagency meeting discussing final project alternatives, Coastal Erosion Study and right-of-way issues.
State Historic Preservation Officer (SHPO)	August 2012	SHPO concurred with four Sea Ranch style residences being eligible for the National Register of Historic Places (NRHP) and California Register of Historical Resources.
SHPO	August 2013	SHPO concurred that the Gleason-Mann-Ballard Ranch is not eligible for the NRHP.
USFWS	August 13, 2013	Section 7 consultation was completed for the supporting archaeological and geotechnical investigations. A Biological Opinion was issued on August 20, 2013.
CDFW	August 29, 2013	CDFW provided input about whether the project requires an Incidental Take Permit.
USACE	August 29, 2013	USACE authorized the archaeological and geotechnical investigations under Nationwide Permit 6.
Sonoma County	October 21, 2013	Caltrans had a meeting with Sonoma County to discuss archaeological and geotechnical investigations.
Sonoma County	December 12, 2013 August 26, 2014	Sonoma County sent Caltrans information pertaining to other planned and approved projects in the project vicinity.

Table 4-1 Agency Coordination Meetings and Contacts

Organization	Date	Topic
NMFS	December 16, 2013	NMFS provided information about potential coho occurrence in the BSA.
USFWS, NMFS, CDFW, USACE, CCC, California Coastal Conservancy, and Sonoma County	January 16, 2014	Meeting to provide update on project alternatives and considerations.
Interagency and public	March 26, 2014	Public scoping meeting.
SHPO	November 4, 2014	SHPO concurred finding of five archaeology sites eligible for NRHP.
Interagency and Public	July 29, 2015	Public meeting on the Draft EIR/EA
CCC	November 20, 2015	Coordination meeting to discuss public access improvements.
California Coastal Conservancy	December 8, 2015	Coordination meeting to discuss public access improvements.
USFWS, CCC, CDFW and NMFS	January 14, 2016	Interagency meeting to provide an update on mitigation strategies.
USFWS	February 18, 2016	Correspondence requesting an amendment to Biological Opinion.
CCC and Sonoma County	March 1, 2016	Project overview and status update.
Sonoma Coast State Parks and California Coastal Conservancy	March 9, 2016	Correspondence requesting concurrence with Section 4(f) de minimis determination. Concurrence on Section 4(f) received from Sonoma Coast State Parks on April 24, 2016.
USACE	March 16, 2016	Correspondence requesting reverification of approved wetland jurisdictional delineation.
California Department of Conservation	March 30, 2016	Notification of public acquisition of Williamson Act land.
NRCS	March 30, 2016	Notification of public acquisition of farmland.
USACE	March 2016	Site visit to verify previous Jurisdictional Determination.
SHPO	April 20, 2016	SHPO concurred with finding of adverse effects on historic properties
CCC and California Coastal Conservancy	April 29, 2016	Project update and Section 4(f) <i>de minimis</i> determination review. Concurrence on Section 4(f) received from the California Coastal Conservancy on May 16, 2016.

Table 4-1 Agency Coordination Meetings and Contacts

Organization	Date	Topic
SHPO	May 25, 2016	Entered into National Historic Preservation Act Section 106 and California Register of Historical Resources PRC Section 5024 Memorandum of Agreement with Caltrans

4.2.1 U.S. Army Corps of Engineers

A Section 404 permit is necessary when a project will result in fill to waters of the U.S. under USACE jurisdiction. The proposed project would result in permanent and temporary impacts to wetland and water features within the project area as discussed in Section 2.3, Biological Environment. Therefore, a Section 404 permit would be required for the proposed project. Caltrans will obtain a Section 404 Nationwide Permit pursuant to Section 404 of the CWA for the proposed project.

Caltrans began coordination with USACE in 2009. In September 2009 the USACE conducted a wetland delineation for the biological study area. USACE issued a jurisdictional determination on August 4, 2010. Caltrans coordination with USACE has included site visits to the proposed project area, discussion of project plan and alternatives, and updates regarding project alternatives and considerations.

Caltrans initiated correspondence with USACE to request a wetland delineation verification based on the previous jurisdictional delineation (File Number 2010-00280N). Caltrans coordination with USACE has included providing GPS-mapped wetland delineation boundaries, which were based in part on the original 2010 delineation and the result of a site visit in March 2016 at the proposed project location to verify mapped wetland areas. Table 4-1 provides a list of meetings conducted thus far with USACE.

4.2.2 North Coast Regional Water Quality Control Board

A Section 401 Water Quality Certification is necessary when a project requires a Section 404 permit from USACE, a federal agency. Because the proposed project will require a 404 permit, a 401 Water Quality Certification from the North Coast RWQCB will also be required. Caltrans will apply for this certification.

Caltrans coordination with the North Coast RWQCB has included discussions on project alternatives, the Coastal Erosion Study (Caltrans 2014g), and right-of-way issues (December 6, 2011). Table 4-1 provides a list of meetings conducted with the RWQCB.

4.2.3 National Marine Fisheries Service

Caltrans initiates consultation with the NMFS when a project has the potential to affect a federally listed anadromous fish species or adversely affect designated critical habitat. The project has the potential to affect steelhead and coho salmon. These effects will be covered under a Programmatic Biological Opinion between NMFS and Caltrans (NMFS 2013).

Caltrans coordination with NMFS has included an initial site visit and assessment; discussions regarding mitigation, project alternatives, and updates regarding project alternatives; and a species list request. Table 4-1 provides a list of meetings conducted thus far.

4.2.4 U.S. Fish and Wildlife Service

Caltrans initiates consultation with the USFWS when a project has the potential to affect a federally listed species, as discussed in Section 2.3, Biological Environment. Caltrans conducted formal consultation with USFWS under the federal Endangered Species Act to cover the effects of the preliminary project investigations on the Myrtle's silverspot butterfly and the California red-legged and obtained a Biological Opinion (USFWS 2013). Formal consultation with USFWS was re-initiated to cover the full project (Caltrans 2016) and an Amended Biological Opinion and Incidental Take Permit were obtained for the proposed project (USFWS 2016b).

Caltrans coordination with USFWS has included species list requests, discussion and correspondence regarding the proposed project and alternatives, technical assistance regarding species to consider in the analysis, mitigation for project impacts, fish passage requirements for Scotty Creek, updates on project alternatives and considerations, and initiation and reinitiation of Section 7 consultation for the proposed project. Table 4-1 provides a list of meetings conducted with USFWS.

4.2.5 California Department of Fish and Wildlife

Sections 1600 to 1607 of the California Fish and Game Code require any agency that proposes a project that will substantially divert or obstruct the natural flow of or substantially change the bed or bank of a river, stream, or lake to notify the CDFW before beginning construction. If CDFW determines that the project may substantially

and adversely affect fish or wildlife resources, a Lake or Streambed Alteration Agreement would be required.

As discussed in Section 2.3, Biological Environment, Caltrans will coordinate with CDFW to evaluate potential effects on coho salmon. A2081(b) Incidental Take Permit may be obtained. Caltrans will obtain a Lake and Streambed Alteration Agreement pursuant to Section 1602 of California's Fish and Game Code.

Caltrans has held several coordination meetings with CDFW to discuss the proposed project, project alternatives, fish passage assessment requirements, and updates on project alternatives and considerations. Table 4-1 provides a list of meetings conducted thus far with CDFW.

4.2.6 California Coastal Commission, California Coastal Conservancy, and California Department of Parks and Recreation

Caltrans has held coordination meetings with the California Coastal Commission, California Coastal Conservancy, and the California Department of Parks and Recreation to discuss plans for the proposed project, the alternatives analysis process, permitting issues, and to receive updates on project alternatives and considerations. Caltrans sent a letter to the California Coastal Conservancy and California Department of Parks and Recreation on March 9, 2016 to request concurrence with Caltrans *de minimis* impact determination pursuant to Section 4(f). Table 4-1 provides a list of meetings conducted thus far and concurrence dates.

Caltrans has held several coordination meetings with Sonoma County regarding Local Coastal Plan policies and project consistency with those policies, and to obtain input on project features, including public access and public outreach. Table 4-1 provides a list of meetings conducted thus far. Caltrans will obtain several environmental permits, including a coastal development permit from Sonoma County.

4.2.7 State Historic Preservation Officer

Caltrans sent a letter to the SHPO on August 2, 2012 to initiate consultation regarding the proposed project. The letter transmitted the Historic Properties Survey Report, Historic Resource Evaluation Report, and an Archaeological Survey Report for the proposed undertaking and requested concurrence on eligibility determinations for historic and archaeological properties to be considered eligible for the National Register of Historic Places (NRHP). The SHPO concurred with the NRHP findings on September 18, 2012 (see Appendix G).

Caltrans sent a letter to the SHPO on June 5, 2013, regarding a change in eligibility and modification of the Area of Potential Effects for the proposed project. The SHPO concurred with the findings on August 7, 2013 (see Appendix G).

SHPO consultation continued with a letter sent by Caltrans on October 23, 2014 regarding eligibility for five archaeological sites for the proposed project. The SHPO concurred with the findings on November 4, 2014 (see Appendix G).

Caltrans further consulted with SHPO, through a letter sent on March 30, 2016, regarding the Preferred Build Alternative's adverse effects to historic properties. SHPO concurred with the finding of adverse effect on April 20, 2016. To resolve the adverse effects to historic properties, Caltrans and SHPO entered into a Memorandum of Agreement on May 25, 2016, which requires the preparation and execution of a Historic Property Treatment Plan to avoid, minimize, and mitigate adverse effects to historic properties (see Appendix G).

4.2.8 Native American Consultation

Caltrans submitted a request to the Native American Heritage Commission (NAHC) on May 5, 2011 for a search of the Sacred Lands file to determine if known cultural sites are located within or near the project APE and for a list of interested Native American groups and individuals who might have information or concerns about the proposed project area. NAHC responded with two letters dated May 13 and May 25, 2011, stating that their files showed no recorded resources within the project APE (see Section 2.1.7, Cultural Resources). The letters also included the names and addresses of interested parties. Caltrans prepared and sent letters to the named individuals and groups on July 8, 2011.

Two federally recognized tribes are culturally affiliated with the project area—the Federated Indians of Graton Rancheria (FIGR) and the Kashia Band of Pomo Indians of Stewarts Point Rancheria. Native American consultation for this project by Caltrans has been ongoing. Caltrans regularly updates the Tribes on the project's status, and tribal representatives have participated in and monitored all archaeological subsurface investigations. Both Tribes have been invited to review and comment on archaeological technical studies and have been provided final copies of all archaeological reports. Consultation with the Tribes has continued with regard to appropriate treatment of the archaeological properties, including avoidance, minimization, and mitigation measures. Caltrans will remain in consultation with both Tribes throughout project design and construction.

4.2.9 Local Historical Societies/Historic Preservation Groups

Caltrans sent letters to local historical societies and historic preservation groups that may have concerns about the proposed project area and/or knowledge of potential historical structures or features. These groups included the following:

- Bodega Bay Historical Society
- Fort Ross Interpretive Association
- Fort Ross State Historic Park
- Rancho Bodega Historical Society
- Sonoma County Genealogical Society
- Sonoma County Historical Society
- Sonoma County Museum

Letters sent on May 19, 2010, described the proposed project and provided each contact with the opportunity to express concerns (see Appendix G). No responses have been received to date.

4.2.10 California Department of Conservation and Natural Resources Conservation Service

Caltrans sent a letter dated March 30, 2016 to the California Department of Conservation pursuant to Government Code §51290 to provide notification of its intent to locate the project on a parcel of Williamson Act land and to pursue the acquisition of land during the permitting and design phase of project development. Caltrans completed the Natural Resources Conservation Service Farmland Impact Conversion Rating form AD-1006 and sent it to the NRCS on March 30, 2016.

4.3 Public Participation

4.3.1 Notice of Availability of the Draft Environmental Document

In accordance with CEQA Guidelines Section 15087 which requires a lead agency to provide public notice of the availability of a draft EIR at the same time it sends a notice of completion to the Office of Planning and Research, Caltrans mailed the Notice of Availability (NOA) to the State Clearinghouse on July 10, 2015. The NOA was published in the Santa Rosa Press Democrat newspaper (see Figure 4-2). The NOA was circulated via mailings to post office routes in Bodega Bay, Occidental, Monte Rio, Jenner, Duncans Mills, and Bodega on July 10, 2015. The project mailing list and the various parties in receipt of the NOA are listed on the distribution list (see Chapter 6.0, Distribution List). The notice provided information on the project,

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA

County of Sonoma

I am a citizen of the United States and a resident of the county aforesaid: I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of The Press Democrat, a newspaper of general circulation, printed and published DAILY IN THE City of Santa Rosa, County of Sonoma; and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Sonoma, State of California, under the date of November 29, 1951, Case number 34831, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates to wit:

The Press Democrat - Legal Notices
7/10 1x - 07/10/2015

I certify (or declare) under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Dated at Santa Rosa, California, on

07/10/2015

Roxanne Nassan

SIGNATURE

PUBLIC NOTICE
 Notice of Availability of the Draft Environmental Impact Report/ Environmental Assessment (EIR/EA) as well as Public Question/ Answer Panel and Open House/Map Display for the State Route 1 Gleason Beach Roadway Realignment Project



What's Being Planned: The California Department of Transportation (Caltrans) proposes realignment of State Route (SR) 1 at Gleason Beach in Sonoma County to maintain the highway, which has been damaged by multiple erosive forces, including severe storms in 1996 and later years. The Environmental Impact Report (EIR)/Environmental Assessment (EA) evaluates three Build Alternatives and one No-Build Alternative.

The proposed project is located in a rural coastal area in unincorporated Sonoma County approximately 5 miles north of Bodega Bay, California, on State Route (SR) 1 between Post miles (PMs) 15.1 and 16.7, immediately southeast of Gleason Beach, and would move the current SR 1 alignment several hundred feet inland. The proposed project consists of constructing a two-lane roadway that would replace the current alignment; a new bridge where the new roadway would cross Scotty Creek, as well as other associated components.

The purpose of the proposed project is to protect SR 1 from coastal erosion while maintaining the Route's long term connectivity.

Why this Ad: Pursuant to the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), Caltrans studied the environmental impacts of this project. The analysis shows that the proposed project will significantly affect the quality of the environment. The document that explains this conclusion is called the Draft Environmental Impact Report/Environmental Assessment (Draft EIR/EA).

This notice is to inform you that the Draft EIR/EA is available for a 45-day public review period from July 10, 2015 to August 23, 2015, and a public meeting is scheduled on July 28, 2015 to accept comments on the Draft EIR/EA. Public comments may also be submitted at any time during the review period to the California Department of Transportation at the address listed below.

What's Available: The Draft EIR/EA is available for review at the following locations:

- Department of Transportation District 4 Office, 111 Grand Avenue, Oakland, CA
- Central Santa Rosa Library, 211 E Street, Santa Rosa, CA
- Guerneville Regional Library, 14107 Armstrong Woods Road, Guerneville, CA
- Occidental Library, 73 Main Street, Occidental, CA

An electronic version of the document is also available online at: www.dot.ca.gov/district4/nvdocs.htm

Where you come in: You are invited to review the Draft EIR/EA for this project and provide comments to us. A Public Question/Answer Panel and Open House/Map Display will be held to solicit comments and questions on the environmental analysis and impacts evaluated in the EIR/EA. Verbal or written comments on the Draft EIR/EA may be submitted at this public meeting or at any time during the review period.

Comments must be received by 5:00 PM on August 23, 2015, and can be submitted via U.S. Mail, fax, or email to:

Oliver Iberien, Branch Chief
 Division of Environmental Planning & Engineering
 California Department of Transportation District 4
 Attn: Thomas Rosevear
 111 Grand Avenue
 Oakland, CA 94612
 Fax: 510-286-5600
gleasonrealignment@dot.ca.gov

When and Where:
WHEN: Wednesday, July 29, 2015, 8:00 PM to 8:00 PM
WHERE: Grange Hall
 1370 Bodega Avenue
 Bodega Bay, CA
 At the corner with Highway 1

Contact: For more information about this study or any transportation matter, call CALTRANS at 510-286-4444. Individuals who require documents in alternative formats are requested to contact the District 4 Public Affairs Office at 510-286-8445. TDD users may contact the California Relay Service TDD line at 1-800-735-2929 or Voice Line at 1-800-735-2922.

2706818 - Pub. Jul. 10, 2015 18.

Figure 4-2 Proof of Publication

including a summary of the proposed improvements, locations where the environmental document can be reviewed including a project website, the address to where comments can be sent, and the close of the comment period (August 24, 2015). The NOA also announced the date and location of the public meeting on the Draft EIR/EA.

4.3.2 Public Meetings

SCOPING MEETING

Section 4.1.2 describes the public scoping meeting that was held for the proposed project on March 26, 2014.

PUBLIC MEETING ON THE DRAFT EIR/EA

An informational flier was mailed to all post office boxes within the in Bodega Bay, Occidental, Monte Rio, Jenner, Duncans Mills, and Bodega communities in July 2015. The informational flier provided information on the project, including a summary of the proposed improvements (see Figure 4-3). The flier also announced the following Public Question/Answer Panel and Open House/Map Display meeting:

Wednesday, July 29, 2015

6:00 pm to 8:00 pm

The Grange Hall

1370 Bodega Avenue

Bodega Bay, CA 94923, at the corner with SR 1

The Public Question/Answer Panel and Open House/Map Display meeting solicited comments and received input from the public and agencies on the environmental analyses and conclusions presented in the Draft EIR/EA document. Comments were taken into consideration for preparation of this Final EIR/EA with FONSI document.

The public open house was organized with informational stations displaying exhibit boards staffed by representatives from Caltrans. Comment sheets were distributed at the meeting and the public was given the opportunity to submit comment cards at the meeting, fill them out later and mail to the address listed on the card, or to submit via email.



This is a simulation of Alternative 19A. Come to the Draft House and see more simulations of the project alternatives or visit one of the following locations to review the environmental analysis in the State Route 1 Gleason Beach Roadway Realignment Project Draft Environmental Impact Report/Environmental Assessment:

- Department of Transportation District 4 Office, 111 Grand Avenue, Oakland, CA
- Central Santa Rosa Library, 211 E Street, Santa Rosa, CA
- Guerneville Regional Library, 14107 Armstrong Woods Road, Guerneville, CA
- Occidental Library, 73 Main Street, Occidental, CA

An electronic version of the document is also available online at: www.dot.ca.gov/district4/cvdocs.htm

What's Ahead:

- Review the Draft EIR/EA and provide comments.
- Project Decisions will follow review of public comments and the final environmental document.
- Construction will likely begin in Spring of 2012.

Environmental Analysis Schedule:

Project Phase	2010				2011				2012			
	Spring	Summer	Fall	Winter	Spring	Summer	Fall	Winter	Spring	Summer	Fall	Winter
Project Scoping	★											
Develop Range of Alternatives												
Prepare the EIR/EA												
Public Meeting						★						
Project Decision												★

★ = milestone

Please review the Draft EIR/EA and provide your input:

Comments must be received on August 23, 2011 by 5:00 PM

Please Mail, Fax, or Email to:

Oliver Iberlin, Branch Chief
Office of Environmental Analysis
Caltrans District 4
Attn: Brian Gatsner
111 Grand Avenue, MS 88
Oakland, CA 94612
Fax: 510-286-5500
gleasonrealignment@dot.ca.gov

Contact: For more information about this study or any transportation matter, call Caltrans at 510-286-4444. Individuals who require documents in alternative formats are requested to contact the District 4 Public Affairs Office at 510-286-6445. TDD Users may contact the California Relay Service TDD Line at 1-800-735-2929 or Voice Line at 1-800-735-2922.

Gleason Beach Roadway Realignment Project
State Route 1, Post Mile 15, 1/15.7, Sonoma County, California

Caltrans proposes to realign a section of State Route (SR) 1 near Gleason Beach in Sonoma County (see map) to maintain SR 1, which is the only road connecting the communities of Bodega Bay and Jenner. State Route 1 has been damaged by multiple erosive forces. The road continues to be undermined by erosion occurring in excess of 1 foot per year and is vulnerable to future storms. Attempts to stabilize the built through installation of piles have been undermined by these strong erosive forces. Caltrans proposes to realign SR 1 away from the shoreline and construct a bridge over Scotty Creek. The proposed project would also include two access roads to connect sections of the old SR 1 alignment to private residences, a public access parking area, a vehicle turnaround area on existing SR 1, and a boardwalk and trailway providing public access to the public beach near Scotty Creek. A third access road would connect the existing SR 1 to private residences only.



Incorporating Input from the Public and Stakeholders

During public scoping in 2010, Caltrans collected comments which have shaped project development and preparation on the environmental document. A few of these topics are summarized here, but the full range of environmental topics can be found in the Draft Environmental Impact Report (EIR)/Environmental Assessment (EA) which is available on the Caltrans District 4 Environmental Documents webpage: www.dot.ca.gov/district4/cvdocs.htm

Public Open House

Please provide your comments on the Draft EIR/EA and talk to Caltrans representatives about your thoughts.

When and Where:

WHEN: Wednesday, July 20, 2011
6:00 PM to 8:00 PM
WHERE: Grange Hall #777
1370 Bodega Avenue
Bodega Bay, CA
At the corner with Highway 1

Agenda

6:00 PM-6:45 PM Open House
6:45 PM-6:50 PM Introduction and Presentation
6:50 PM-8:00 PM Q&A Session

Environmentally Sensitive Project Design

The proposed project has been developed to avoid and minimize impacts on the environment. Caltrans has conducted general and species-specific plant and wildlife surveys. These studies have shaped the project's design, including the roadway alignment location, access roads, parking area, and bridge length. Preservation of the highly scenic coastal landscape is addressed by maintaining the road as a two-lane roadway, with the proposed bridge designed to blend into its surroundings to the degree practical, while minimizing long-term maintenance demands and environmental impacts.

Enhancing Scotty Creek

The proposed project will remove the existing culvert near Scotty Creek which is a partial impediment to fish migration. The removal would benefit coho salmon and steelhead. The new bridge would "lay flat" a section of the creek, improve tidal flow, and span the Scotty Creek floodplain.

Beach Parking

The proposed parking area will provide some parking, and should along the new access roads may be utilized in a similar fashion as the existing SR 1 shoulders. Access roads are designed to a low vehicle access and parking, a vehicular turnaround space at the south access road terminus, and access from existing SR 1 to the beach.

Harbor Seals

The areas used by seals are not located within the project area nor proposed construction staging areas, but are close by. The proposed project is not expected to affect the seals. Furthermore, beach access will be maintained throughout construction.

Gleason Beach Roadway Realignment Surroundings:

SR 1 at the proposed project site, is a two-lane roadway with narrow shoulders.

The existing SR 1 segment at Gleason Beach parallels the Pacific Coast on the western side and is bounded by open Coastal Plain on the eastern side. The roadway is bordered by two Sonoma Coast State Parks, Gleason Beach at the north end of the project and Portuguese Beach immediately to the south of the project limits.

Sensitive natural communities within the project area consist of coastal terrace prairie, wetlands, northern coastal scrub, coastal bluff and sandy beach. Based on several surveys, six special status animal species are known or likely to occur on site:

- Myrtle's silverspot butterfly
- Steelhead
- Coho salmon
- California red-legged frog
- Tricolored blackbird
- American badger

The Gleason-Mann-Ballard Ranch is a historical resource that was used between the 1860s and 1940s as a dairy ranch on a 166-acre rural parcel that sits directly east of the project area.



What are the Alternatives?

The proposed project would move the current SR 1 alignment several hundred feet inland, and consists of constructing a two-lane roadway that would replace the current alignment, a new bridge where the roadway would cross Scotty Creek, as well as other associated components.

Effects of Natural Erosion: Tons of sand erode from the Pacific coast cliff into the ocean every year. In this area, the erosion is expected to increase from an average of 1 foot of shoreline eroded every year up to about 2 feet per year in 2035. Near the project area, 10 of 21 homes that were originally built along the shore have been undermined by erosion.

The Draft EIR/EA reviews three alternatives known as 19A, 19B and 20. They are described below:

Build Alternative 19A would construct a 3,700-foot roadway and have its southern terminus 1,000 feet to the south of the existing Scotty Creek Bridge. The new bridge section would be 900 feet long. This Alternative would be the closest to the coast.

Build Alternative 19B would construct a 3,800-foot roadway and have its southern terminus 1,200 feet to the south of the existing Scotty Creek Bridge. The new Scotty Creek bridge section would be 900 feet long. This Alternative would be the greatest in length.

Build Alternative 20 is the farthest east alternative and would be a 3,000-foot roadway with its southern terminus 500 feet to the south of the existing Scotty Creek Bridge. The new Scotty Creek bridge section would be 750 feet long. This Alternative would be the shortest in length.

How do the Alternatives Compare?

Key Environmental Topic	No Build	Alternative 19A	Alternative 19B	Alternative 20
Property Acquisition/ Relocation	None	Total of 34 acres from 3 parcels, no relocations	Total of 15.5 acres from 3 parcels, no relocations	Total of 11.5 acres from 3 parcels, no relocations
Land Use Consistency	No Conflict	No consistency with Sonoma County		
Visual	No effect	Lower Visual Quality from 3 key viewpoints		
Cultural Resources	No Effect	Adverse change to 1 historic farm and 4 archaeological sites	Adverse change to 1 historic farm and 5 archaeological sites	Adverse change to 1 historic farm and 4 archaeological sites
Water Quality	No effects	Remove existing structure, construction impacts		
Biology	None to minimal, as a result of continued roadway use and coastal erosion on natural communities and special status animal species	Potential direct and indirect impacts on Coastal terrace prairie, an environmentally sensitive habitat area, wetlands and other waters, and special status animal species		

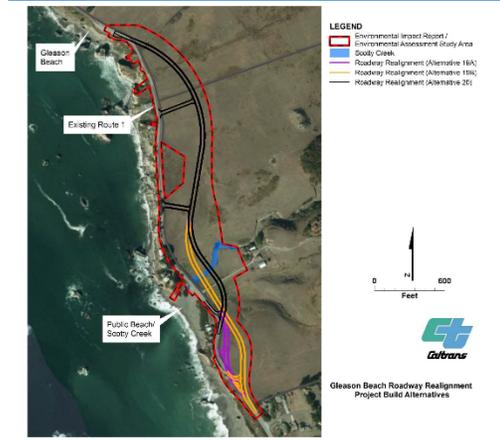


Figure 4-3 Informational Flier for Public Meeting on the Draft EIR/EA

Approximately 25 comments were submitted at the meeting, by mail, or by email. The following is a list of the key comments received during and after the public open house:

- Visual impact and design of the roadway, bridge and public access improvements
- Restoration of Scotty Creek and recovery of coho salmon and steelhead trout
- Public access to Gleason Beach and design of the public access boardwalk and stairs, parking and access roads
- Lack of adequate notification for the public open house
- Impacts to plant and animal species, specifically Myrtle's silverspot butterfly, California red-legged frog and salmonids
- Consistency with the Coastal Act and Sonoma County Local Coastal Program (LCP)
- Coastal erosion
- California Coastal Trail connection

PUBLIC MEETING ON THE PROJECT UPDATE

To provide the public with a project update since the release of the Draft EIR/EA and identification of the Preferred Build Alternative, another informational flier was mailed to all post office boxes within the Bodega Bay, Occidental, Monte Rio, Jenner, Duncans Mills, and Bodega communities in March 2016 (see Figure 4-4). The flier provided information on the project, including a summary of the proposed improvements, and announced the following informational meeting on April 12, 2016 in Bodega Bay:

Tuesday, April 12, 2016

6:00 pm to 8:00 pm

The Grange Hall

1370 Bodega Avenue

Bodega Bay, CA 94923, at the corner with SR 1

The informational meeting consisted of information stations displaying exhibit boards and staffed by representatives from Caltrans. Caltrans also conducted a presentation and responded to questions and comments from the public.



Gleason Beach Roadway Realignment Project

State Route 1, Post Mile 15.1/15.7, Sonoma County, California

Spring 2016

Caltrans proposes to realign a section of State Route (SR) 1 near Gleason Beach in Sonoma County (see back page) to maintain SR 1, which is the only road connecting the communities of Bodega Bay and Jenner. SR 1 has been damaged by multiple erosive forces. The road continues to be undermined by erosion occurring in excess of 1 foot per year and is vulnerable to future storms. Attempts to stabilize the bluff through installation of piles have been undermined by these strong erosive forces.

Project Description

The Gleason Beach Realignment Project would construct a 3,700-foot, two-lane roadway and 900 feet long bridge span, starting south of the Gleason Beach area. The two-lane roadway and bridge span would be 49-feet wide with 6- to 8-foot shoulders and a 6-foot sidewalk in the southbound direction to accommodate bicycle and pedestrian access.

The bridge structure would span the Scotty Creek channel, and the existing box culvert and grade-separation structure at Scotty Creek would be removed.

Three separate access roads would connect the project to the pre-existing SR 1. The project will provide public access improvements including a board walk and a stairway connection to the beach, a vehicular turnaround and a dedicated parking pad.

Project Status

The Draft Environmental Impact Report/ Environmental Assessment (EIR/EA) was made available for a 45-day general public and public agency review period from July 9, 2015 to August 24, 2015. The final EIR/EA is expected June 30, 2016.



As a result of public input and Caltrans' evaluation of potential environmental impacts associated with the three alternatives discussed in the Draft EIR/EA and public input, Alternative 19A was identified as the preferred alternative.

Project Benefits

- ◆ Continued access along SR 1 for residents, visitors and businesses near Gleason Beach
- ◆ A long-term approach to address continual coastal bluff erosion that threatens the stability of the roadway
- ◆ Preservation of the highly scenic coastal landscape by maintaining the road as a two-lane roadway
- ◆ Daylighting Scotty Creek is expected to improve the flow of Scotty Creek and thus have a beneficial effect upon the creek
- ◆ Non-motorized enhancements including bicycle and pedestrian access
- ◆ Enhanced public access including some parking, vehicular turnarounds and beach boardwalk/stairs

Informational Meeting

Caltrans invites you to an informational meeting for a project update. See the latest roadway and bridge project renderings.

When: Tuesday, April 12, 2016, 6:00 PM to 8:00 PM

Where: Grange Hall #777, 1370 Bodega Avenue, Bodega Bay, California (at the corner with Highway 1)

Figure 4-4 Informational Flier for the Project Update Meeting

Approximately 22 questions and comments were addressed during the informational meeting. The following is a list of the key questions and comments received during the meeting:

- Status of the existing SR 1 roadway and the need for immediate repairs
- Safety concerns and status of plans to limit heavy trucks from traveling on SR 1
- Establishment of one-way traffic controls during road repairs
- Public access, including parking
- Delineation of private property, Caltrans property and State Parks property, and management thereof
- Public access and street parking configurations and parking signage
- Parties responsible for ongoing maintenance and clean-up of beach boardwalk and stairs
- Americans with Disabilities Act (ADA) accessibility of beach boardwalk and stairs
- Drainage that will be sufficient to protect the remaining structures
- Permitting for geotechnical surveys
- Construction hours, seasonality, and contractor oversight during investigations and construction
- Post-project responsibility for the abandoned section of SR 1

4.3.3 Public Comments and Responses to Comments

This section provides responses to comments received during the public review period for the Draft EIR/EA. Included are copies of all comment letters received up to the end of the public review period, along with the associated responses. Comments received after the comment period are not part of this environmental document.

Comment Letter Legend

FA = Federal Agency

SA = State Agency

LJ = Local Jurisdiction

LC = Local Community Group

I = Individual



State of California • Natural Resources Agency
Department of Conservation
Division of Land Resource Protection
801 K Street • MS 18-01
Sacramento, CA 95814
(916) 324-0850 • FAX (916) 327-3430

Edmund G. Brown Jr., Governor
John M. Lowrie, Assistant Director

August 3, 2015

VIA EMAIL: gleasonrealignment@dot.ca.gov

Mr. Oliver Iberien, Branch Chief
Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

Dear Ms. Oliver Iberien:

STATE ROUTE 1 GLEASON BEACH ROADWAY REALIGNMENT PROJECT; DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT; SCH #2011022002

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report/Environmental Assessment (DEIR/EIA) submitted by the Department of Transportation (Caltrans). The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. The Department offers the following comments and recommendations with respect to the proposed project.

Project Description

The proposed project consists of constructing a two-lane roadway, replacing the current alignment and its capacity. The new alignment would have one 12-foot lane and 8-foot shoulder in each direction. The existing box culvert and grade-separation structure at Scotty Creek would be removed along with portions of the existing adjacent roadway, and the creek would be returned to a more natural open channel. Where the new alignment crosses the Scotty Creek channel, a new bridge and abutments would be constructed. The bridge structure would be 900 feet long for Alternatives 19A and 19B and 750 feet long for Alternative 20.

The project is approximately 5 miles north of Bodega Bay, in unincorporated Sonoma County; more specifically, the project site is located between post miles 15.1 and 15.7 immediately southeast of Gleason Beach. The proposed project area is currently used for grazing and is classified as Grazing Land, in the 2012 Important Farmland Map produced by the Department of Conservation's Farmland Mapping and Monitoring Program. Currently the southern-most parcel in the project area (Gleason-Mann-Ballard Ranch) is enrolled in a Williamson Act contract. "All build alternatives would result in the conversion of land under a Williamson Act contract"¹.

Public Acquisition Notification Process

The Williamson Act statute states that public agencies shall notify the Director of the Department, *before* making a decision to acquire property located in an agricultural preserve (Government Code(GC) §51291(b)). On April 2, 2014, the Department commented on the Notice of Preparation

SA1-1

¹ State Route 1 Gleason Beach Roadway Realignment Project, Draft Environmental Impact Report/Environmental Assessment, 040A0200, page 2-39.

Mr. Oliver Iberien, Branch Chief
August 3, 2015
Page 2 of 3

SA1-1
(cont'd)

for this project, but to date, the Department has not received the required notice. The effect of GC §51291(b) is to enable the acquiring public agency to evaluate the ramifications of purchasing land (or land interests, such as an easement) located in an agricultural preserve. The manner in which property acquisition is followed is important as purchase by a public agency does not, by itself, nullify a Williamson Act contract. If the acquisition is not made in compliance with § 51295, the contract will stay on the land and the acquiring agency may incur additional costs and time delays if the contract must be removed via a different mechanism. The Department will be in a better position to assist Caltrans in accomplishing its goal, if the Department is provided the pre-acquisition and post-acquisition notices required by § 51291.

It is important that the notice come to the Department before Caltrans begins negotiating with landowners. In order for Caltrans to meet the notice requirements and facilitate the project, it should directly notify the Director of the Department of Conservation of its intent to acquire land located within an agricultural preserve for the above mentioned project.

Enclosed for your benefit is a copy of the Public Acquisition Notification Provisions of the Williamson Act, which we offer as a guide for the public process. Notice is required in the following instances:

1. Notice before making a decision to acquire property located in an agricultural preserve;
2. Notice within 10 days when the property is actually acquired;
3. Notice if the public entity proposes any significant changes to the acquisition; and
4. Notice after acquisition if the acquiring public agency decides not to acquire the property for the intended purpose.

As part of the notice process (GC § 51292(a)), Caltrans will provide findings and support information to the Department that the location of the project is not based primarily on the lower cost of acquiring agricultural land and that there is no other land within or outside of the preserve on which it is reasonably feasible to locate the public improvement.

Thank you for giving us the opportunity to comment on the State Route 1 Gleason Beach Roadway Realignment Project Draft Environmental Impact Report/Environmental Assessment. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,



Molly A. Penberth, Manager
Division of Land Resource Protection
Conservation Support Unit

Enclosure

cc: State Clearinghouse

Mr. Oliver Iberien, Branch Chief
August 3, 2015
Page 3 of 3

cc: Sonoma County Board of Supervisors

cc: Sonoma County Farm Bureau

Response to Comment Letter SA1: Division of Land Resource Protection

Response SA1-1

Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Your comments are addressed below.

Caltrans will fully comply with the public acquisition requirements outlined by the Division of Land Resource Protection regarding lands under the Williamson Act contract that may be affected by the proposed project.

A letter from Caltrans to the Division of Land Resource Protection was sent on March 30, 2016 to comply with the notification requirements and to present Caltrans' findings in support of siting of the Preferred Build Alternative on agricultural lands.

Caltrans is also in coordination with the Natural Resources Conservation Service in order to ensure full compliance with federal public acquisition requirements.

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., GOVERNOR

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



August 24, 2015

State of California Department of Transportation (Caltrans)
Attn: Oliver Iberian
Office of Environmental Analysis, MS-8B
Caltrans District 4
111 Grand Avenue
Oakland, CA 94612

RE: Comments for Draft Environmental Impact Report/Environmental Assessment for the Proposed State Route 1 Gleason Beach Roadway Realignment Project (PM 15.1/15.7)

Dear Mr. Iberian,

SA2-1 | Thank you for your recent submittal of the Draft Environmental Impact Report/Environmental Assessment (Draft EIR/EA) for the proposed State Route 1 roadway realignment project at Gleason Beach in Sonoma County. Coastal Commission staff believes the realignment of Route 1 in this area can enhance public access along the coast, and has the potential to result in far fewer coastal resource impacts than continuing to attempt to maintain the roadway in its current alignment. Coastal Commission staff remains very supportive of Caltrans' progressive approach to this project.

SA2-2 | Nonetheless, the proposed realignment raises numerous issues to be evaluated related to conformity with the Coastal Act and the Sonoma County Local Coastal Program (LCP). After our review of the Draft EIR/EA, we have the following comments regarding issues that need to be addressed so that the County and the Commission can adequately evaluate the proposed project for consistency with the County's certified LCP and applicable Chapter 3 Coastal Act policies. The project poses a variety of potential coastal resource issues, including protection of public access and impacts to wetlands, sensitive species, water quality, coastal views, cultural resources and agricultural lands. These impacts depend largely on the design and location of the realigned highway and any structures associated with it. As discussed in more detail below, we encourage Caltrans to address all identified issues and concerns and design project alternatives that will comport with Coastal Act and LCP policies. As you are aware any subject coastal development permit review will need to address project alternatives for first avoiding, then minimizing, negative impacts, and, finally, providing required mitigation measures for any remaining impacts.

We offer the following suggestions and comments.

SA2-3 | **LCP Amendment/Consolidated CDP Application**

SA2-3 (cont'd) The majority of the proposed realignment project lies within areas where the Coastal Commission has delegated coastal development permit (CDP) authority to Sonoma County, although a portion of the project does occur within the Commission's retained CDP jurisdiction. Thus, this project will eventually need CDP(s) from both the County and the Commission, or alternatively, from just the Commission utilizing a consolidated coastal development permit application as permitted under Coastal Act Section 30601.3.

SA2-4 *LCP Amendment*
In order to accommodate the proposed project, amendments to the County's certified LCP may be required. Specifically, the Draft EIR/EA states that the proposed project is not consistent with the certified LCP with respect to view protection, and that no mitigation measures are available to address this inconsistency. Commission staff also notes that there appear to also be LCP inconsistencies with respect to wetlands, sensitive species, water quality, cultural resources and agricultural lands. Therefore, it appears that Caltrans will have to request a project-driven LCP amendment from the County to then be submitted to the Commission for consideration and certification in order to accommodate the proposed project.

SA2-5 Please note that the County must complete the necessary LCP amendments process prior to processing a coastal development permit (CDP) for the project, since the County's standard of review for any CDP is consistency with the policies and terms of the certified LCP. Thus, the necessary CDP review will be dependent on the outcome of the Coastal Commission's review of the LCP amendment. The standard of review for any proposed Land Use Plan (LUP) amendment is the Coastal Act. In order for the LUP amendments necessary for the project to be approved, the Commission would need to find that the proposed LUP amendments are consistent with applicable Coastal Act policies. In summary, the project would require a LCP amendment first, and then CDPs from both the County and the Commission.

SA2-6 *Consolidated CDP Application*
Alternatively, rather than to pursue an LCP amendment and then two CDPs for the project, the County and Caltrans can request that the Commission's Executive Director agree for the Commission to review the entire project (including the portion within Sonoma County's LCP jurisdiction) together as one combined and consolidated CDP application as allowed under Section 30601.3 of the Coastal Act. In this case, the standard of review for the entire proposed project would be the Chapter 3 policies of the Coastal Act, with the Sonoma County LCP providing non-binding guidance.

SA2-7 **Long Term Plan**
The Commission would like to have a clearer picture for Caltrans' long term plan for this area. All alternatives offered involve the construction of 2 vertical access roads to the realigned highway. Are both vertical access roads necessary? What are Caltrans' legal obligations to provide road access to the remaining homes or lots of record along the old highway? What specific plans do you have for the rehabilitation of the old Highway 1 between the two access roads, particularly in light of the expected continuation of shoreline erosion in that area? What happens if additional homes on the bluff are threatened by, or succumb to, the advancing

SA2-7 (cont'd) erosion? Do any of Caltrans' legal obligations to provide access to parcels change if the parcels have no developable area? As we have expressed in the past, we will need a full alternatives analysis for responding to expected changes and impacts over the life of the new highway facility. For example, this analysis should include a comparison of potential impacts and long term costs associated with the installation and maintenance of the two vertical access roads vs. buying out some or all of the remaining property owners and deleting the two access roads from the project. Additional information is also needed regarding plans for the land located between the old highway and the new realigned highway, particularly in relation to the siting and long-term maintenance of the California Coastal Trail and the protection of sensitive resources in the area.

Coastal Erosion

SA2-8 *Slope Stability Analysis*
The Commission generally requires a quantitative slope stability analysis showing how far from the bluff edge a structure must be located for it to have a factor of safety of 1.5. That distance is then added to the expected bluff retreat over the structure's design life. The goal is to assure a factor of safety of 1.5 for the entire design life of the structure. As Commission staff has previously stated, the Draft EIR/EA should demonstrate that the proposed alignment will have this level of stability, or why it is not necessary in this case. Such an analysis is not included in the Draft EIR/EA, but it will be necessary in order to ultimately review a forthcoming CDP application for the proposed project.

SA2-9 *Proposed Rock Slope Protection*
Each of the three alternatives considered in the Draft EIR/EA includes the expansion of the existing rock slope protection (RSP) to the south of Scotty Creek in order to "facilitate stability of the slope against erosive forces." The expansion of the existing rock slope protection would be considered construction altering natural shoreline processes, and would be analyzed under Coastal Act Section 30235. The Coastal Act provides these limitations because shoreline structures can have a variety of negative impacts on coastal resources including adverse effects on coastal resources and overall shoreline beach dynamics. However, Table 2-2 does not consider the proposed expansion of the RSP in its assessment of the project's consistency with Section 30235.

SA2-10 The Draft EIR/EA also incorrectly states that the project would result in no effect on public beaches (e.g., 2-16), without considering the potential loss of beach caused by the expanded footprint of the RSP. Section 30235 requires that construction of such a structure be permitted only when required to serve coastal-dependent uses or to protect existing structures of public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Therefore, the Final EIR/EA should explain the erosive forces of concern and provide a full alternatives analysis for addressing those concerns. Any continuing proposal for expanding the RSP to the dimensions, and in the manner proposed, must be fully justified and compared against the other alternatives studied. The Final EIR/EA should also consider the impacts of the proposed RSP expansion to the public beach, as well as potentially less environmentally damaging alternatives. Other approaches for addressing shoreline erosion concerns might include the use of a retaining wall, which would have smaller footprint on the

- SA2-10 (cont'd) public beach, as well as potentially rerouting the access road to the ranch, thus eliminating the need to protect the road as far north as currently required under all proposed alternative project designs. Potential mitigation for the adverse impacts on local shoreline sand supply and recreational beach uses from the selected alternative should also be included in the Final EIR/EA.
- SA2-11 *Potential Scouring Under SLR Scenarios*
The Draft EIR/EA includes an analysis of hazards to the proposed bridge structure resulting from 8.9-foot waves propagating into Scotty Creek in a 100-year Total Water Level (TWL), high NRC A1F1 scenario in the year 2100, and at lower TWL conditions. The analysis indicates that the conditions resulting from sea level rise could result in scouring to the foundation of the bridge columns in the creek. Please clarify the adaptive measures being considered to account for potential SLR impacts, and if they include design changes (e.g., increasing the depth of the columns), potential future armoring, or other methods. Please clarify the depth of the scour that would occur under the scenarios used for the sea level rise analysis.
- SA2-12 *Potential Effects of Change in Storm Orientations*
Scientists predict an increase in storms approaching the coast from a southern direction. Please consider the potential hazards and erosive forces that would impact the proposed alternatives if in the future there is an increase in occurrence of storms coming from south.
- SA2-13 **Public Access**
California Coastal Trail
The Draft EIR/EA should more clearly identify how public access for pedestrian and bicyclists will be provided under each of the proposed alternatives. The Draft EIR/EA indicates that the project would reduce the gap in the California Coastal Trail (CCT) by providing 8-foot shoulders on the realigned road (4 feet of which would be paved and 4 feet graveled) and allowing cyclists and pedestrians to use that shoulder. The optimal CCT location for lateral pedestrian and recreational bicycling access is best summarized in the alignment principles stated in the document *Completing the California Coastal Trail* (Coastal Conservancy, 2001), i.e. that the alignment should be within the sight, sound and scent of the sea.
Not only would routing the CCT along the new highway alignment deprive the public of the desired proximity and access to the sea, it would result in close exposure of pedestrians and recreational cyclists to motor traffic and its attendant noise, fumes and hazards. The paved shoulder of the realignment will be adjacent to and not buffered from fast-moving motor vehicle traffic, and thus is not designed to function as a safe, comfortable or convenient route for pedestrians. And while the paved shoulder would accommodate through-cyclists, it would not be nearly as attractive for casual recreational bicyclists as would a separated path. Moreover, there are multiple competing purposes for the proposed shoulder in addition to bicyclist and pedestrian use, including space for vehicles to stop due to mechanical difficulties, flat tires, or other emergencies; and space for evasive maneuvers to avoid potential crashes or reduce their severity.
- SA2-14 Alternative alignments, including seaward alignments of the CCT that utilize portions of the existing Route 1 and/or the area between the existing and proposed alignment must also be examined. In addition, a full range of options should be examined for pedestrians and cyclists

- SA2-14 (cont'd) | crossing Scotty Creek, including measures to separate bicycle and pedestrian traffic from motorized traffic on the proposed bridge, as well as a potential secondary bridge structure for exclusive pedestrian and bicycle use connecting the portions of Route 1 that are to remain in place under each alternative. If any of these alternatives have been considered and dismissed, please present the supporting information.
- SA2-15 | *Public Parking*
The proposed project would result in the removal of existing roadway shoulder parking available near the public beach. To minimize this impact, the proposed project includes construction of a parking pad north of Scotty Creek. Please clarify how many informal spaces are currently available to the public, versus those that would be available under the proposed project and compare the ease of accessing the beach between the current and proposed parking. Please clarify if any public parking would remain available on the southern end of Scotty Creek.
- SA2-16 | *Beach Access*
Under each of the proposed alternatives, an enlarged RSP would be installed on the southern end of Scotty Creek to address erosive forces threatening the roadway. Please examine the potential to install a walkway, staircase, or other mechanism to provide for useable public access to the beach on the south end of Scotty Creek. As part of the examination of potential alternatives to the enlarged RSP (see Coastal Erosion section above), please consider the potential impacts to public access for each alternative and possible measures to provide continued public access to the beach under each alternative.
- SA2-17 | **Visual Resources**
Treatment of Retaining Wall
Alternative 20 proposes the use of a retaining wall along the existing roadway to the south of Scotty Creek. Please consider if the type of wall proposed could be treated with a covering that would lessen the visual impact of this wall as seen by the public from the public beach.
- SA2-18 | *Reduction in Paved Shoulder Area*
Mitigation Measure 3.3.1 is to reduce paved area of shoulders to 4 feet with an additional 4 feet of gravel or rock on non-bridge portions of the realignment project, where feasible, in order to minimize the visual character and quality of the proposed project caused by the increased scale and dominance of the proposed roadway. Please clarify the parameters under which such a mitigation measure would be considered feasible, and those under which it would not be considered feasible. Also include a discussion of any necessary or appropriate transitions or co-locations of the California Coastal Trail alongside the roadway.
- SA2-19 | **Biology**
Temporary Impacts Definition
The definition provided in the Draft EIR/EA for temporary impacts does not match our definition which requires that impacted vegetation be restored to its original state or better (e.g. restored vegetation should have the same age structure as that removed, and full restoration should occur within a year of removal). Therefore, unless perennial and/or woody vegetation is restored to its

- SA2-19 (cont'd) | pre-project age class, and its community interactions restored within the space of a single year, it cannot be considered a temporary impact.
- SA2-20 | *Access Roads*
Construction of access roads should be specifically designed to avoid native perennial grasses, particularly California oatgrass. If possible, Velder grass, *Holcus lanatus* should be removed in the locations of any areas that will be disturbed, and methods to eradicate the seedbank deployed. This grass is aggressively invasive. Opening up areas for invasion will only facilitate its spread. Moreover, grazing should be excluded from the restoration area until the coastal prairie is considered fully restored and self-sustaining. Unless native grasses are restored with mature, well-developed tussocks, they cannot be considered restored. Moreover, removal and replacement of native grasses cannot be considered temporary. These grasses must be established early in the fall season, and tracked over at least three years, with concomitant weeding to be considered restored. The removal of vegetation from ruderal areas provides an opportunity for restoration to native coastal prairie. Access roads should also avoid plants favored by Myrtle's silverspot butterfly, particularly western dog violet, and including *Erigeron glaucus*, *Grindelia spp.*, *Abroni latifolia*, *Monardella spp.*, and *Cirsium vulgare*. Road travel on access roads should be limited to 5-10 mph, with appropriate signage, in order to reduce the possibility of collision with wildlife during construction.
- SA2-21 | *Night Construction*
Because many nocturnal and crepuscular species frequent this area, construction at night or at any time when lighting would be required should be prohibited. This will reduce the chance of collisions with these species. If construction is to occur at night, a lighting plan with details on wattage and shielding of lights should be required and approved prior to construction.
- SA2-22 | *Noise*
Please provide more information on the noise levels (in decibels and at what distances) that will occur and how that might affect wildlife.
- SA2-23 | *Myrtle silverspot butterfly*
Caltrans proposes to mitigate for the loss of coastal prairie habitat for Myrtle silverspot butterfly (MSB) by "enhancing" habitat for this species in areas near to the study site. The Coastal Commission requires a higher mitigation ratio than 1:1 when "enhancement" is performed in lieu of actual mitigation of areas previously void of a particular habitat. In addition, the suitability of this area's coastal prairie may be obliterated or severely degraded by fragmentation of the area for MSB. Many species require habitat of a certain minimum size in order to provide viable habitat. Therefore, the sum of its contiguous parts that form a cohesive foraging/breeding area may be a more meaningful habitat metric than the sum of its total area, if the area is fragmented by paved surfaces. Given these observations, habitat must be restored/enhanced at an agreed upon ratio that is much larger than 1:1. Moreover, the specific measurable criteria, in addition to those listed in Mitigation Measure Bio-B, must be provided prior to the start of construction. Every effort should be made to preserve new/enhanced habitat into perpetuity, given the extreme rarity of this species and its overall vulnerability to stochastic events.
- SA2-24 | Although not a listed plant species, the western dog violet, *Viola adunca* must be accorded special

- SA2-24 (cont'd) | status of the most protected species by virtue of its significance as a larval food plant to MSB. Other plants which provide nectar to MSB must also be given special consideration including *Erigeron glaucus*, *Grindelia spp.*, *Abroni latifolia*, *Monardell spp.*, and *Cirsium vulgare*. These species should be included in plan palettes for restoration of coastal prairie. Because the western dog violet is frequently found amidst iris and sedge or rush patches, these patches must likewise be protected if the violet is present within them.
- SA2-25 | Because construction activities are expected to coincide with the adult flight state of MSB (late June through early September), the strictest measures must be implemented so the species is not harmed or impaired.
- SA2-26 | To protect MSB, which are found in regions of low wind, care must be taken to preserve the existing wind regime. Construction activities that have the potential to disturb the sheltered wind environment of the BSA must be carefully undertaken to preserve the current low wind regime. Unless obvious from casual observation, 3-D anemometers should be set up on site prior to construction to determine the landscape features that lead to the sheltered wind environment enabling use by MSB. Such an approach would provide the data necessary to understand important site features that maintain the low wind environment, and would provide a basis for ensuring these features remain in place during and post construction.
- SA2-27 | Areas to the north of the study area that also contain large patches of western dog violet should be considered as mitigation areas for permanent loss of coastal prairie. Whether or not grazing is allowed on these lands must be carefully considered.
- SA2-28 | All of the alternatives occur in proximity to or overlap MSB breeding habitat. Given the extreme rarity of this species, efforts to re-establish this habitat should be employed before construction begins. Efforts to enhance or establish MSB foraging habitat should also occur, and be approved by a qualified entomologist before construction.
- SA2-29 | The proposed mitigation measures outlined in BIO-B may or may not be feasible for MSB depending on the wind regime of the proposed enhancement areas. The suitability of these areas for breeding and foraging must be assessed by a qualified entomologist prior to construction. If mitigation is to be at 1:1, the area must be fully restored and supporting MSB before construction begins. If not, a suitable mitigation ratio must be negotiated between the relevant agencies.
- SA2-30 | Given the limited knowledge of MSB restoration practices, one additional means to mitigate for butterfly loss is to fund research into measures most likely to aid in MSB recovery in the form of grants to appropriate entities. The loss of MSB breeding and foraging habitat remains the most problematic of the biological impacts resulting from this project.
- SA2-31 | *California Red Legged Frog*
We cannot locate the location of the dispersal habitat for CRLF that will be destroyed by project construction. Is this the area of the bridge itself? If the area of dispersal loss could be added to Figure 2-25, or an additional figure provided, that would be helpful.
- SA2-31 | In addition to funding enhancement efforts of CRLF habitat in other Sonoma County locations,

- SA2-31 (cont'd) | can a dispersal corridor be constructed at Scotty Creek to facilitate CRLF dispersal to areas for migrating frogs near the location of lost dispersal habitat?
- SA2-32 | The locations of enhancement areas and the mitigation ratio used for the loss of CRLF habitat must be specified. These areas must be agreed upon prior to construction. Onsite mitigation for the loss of upland dispersal habitat for CRLF is preferable. If grazing is an impediment to on-site mitigation, a grazing prohibition for this area should be considered.
- SA2-33 | *Additional mitigation ratio needs*
Please provide intended mitigation ratios and mitigation locations for permanent removal of Northern coastal scrub and coastal bluff. Because the ruderal vegetation that is removed is of a low habitat value, it should not be restored, but the lost acreage should be mitigated for onsite at a ratio of 1:1, replacing any adjacent habitat type. Alternatively, if the ruderal vegetation is in its current degraded state due to continual disturbance, and this disturbance is likely to continue post construction, then this land area should not be considered suitable for mitigation.
- SA2-34 | Sandy beach loss should also be mitigated for at a ratio of 1:1 and restored as sandy beach or another habitat type. Areas where temporary impacts occur must be monitored to ensure disturbance does not result in invasive species colonization (e.g. *Ammophila*).
- SA2-35 | *Measure Bio-1*
It makes sense for the species to be restored on a site specific basis, assuming the criteria for restoration is ecologically sound and the restored community is likely to be self-sustaining. Replacement of the disturbed vegetation community, but to a more pristine state than existed prior to disturbance, is likely to be the preferred alternative in most locations.
- SA2-36 | *Measure Bio-2*
In addition to serving as a marker of ESAs, the fencing must prevent silt and dust from entering those areas, whenever possible. Silt fencing, etc. is preferred. Bio-2 also mentions the production of construction plans with mapped ESHA. These maps must be provided for review well in advance of construction to allow time for review of placement of access roads and staging activities, relative to the location of ESHA.
- SA2-37 | *BIO-8*
A biological monitor should be onsite or at least very readily contacted at all times during the construction phase, given the large number of very sensitive species at the site.
- SA2-38 | *Coastal Prairie*
Consideration of cumulative impacts to coastal prairie habitat is important. Huge tracts of intact native California grassland have been lost, and those tracts that remain are concentrated within the coastal zone because of the suitable climate along the coast (especially the northern coast). If construction in the vicinity will whittle away at what remains, then restoration of coastal prairie in locations now dominated by non-native grass communities (of which there are numerous locations) within the coastal zone is appropriate, and would be a good focus of mitigation efforts for this project. Although it is noted (pg-2-210) that the cumulative loss of coastal prairie is small compared to the amount of coastal prairie habitat within the RSA, it does not mention the

SA2-38
(cont'd) | quality of the habitat which remains. Much of this coastal prairie habitat is highly invaded by non-native grass and forb species. High quality coastal prairie habitat is much less plentiful. There are good resources in the state, spearheaded by the California Native Grass Association, to implement native grass restoration, although this is an involved and multi-year process.

SA2-39 | *Additional Comments*
It is stated on page 2-155 that Scotty Creek lacks riparian vegetation. The report also states that the creek has “experienced disturbance for over a century from agricultural grazing.” These are likely related. Riparian vegetation could establish a buffer for the creek, reducing the impact of dairy cow/agricultural inputs. Mitigation measures could include fencing the area adjacent to the creek to prevent grazing of riparian species. Direct planting of riparian trees could also improve the situation.

SA2-40 | Is it part of the biological plan to facilitate the transition from sun to shade tolerant and shade to sun tolerant wetland species? Community transition is mentioned in the report (pgs. 2-160 – 2-161), however many of the wetland species expected to naturally transition will be removed or disturbed during the construction process.

SA2-41 | In each of the build alternatives there is mention of temporary and permanent impacts. In order to be considered a temporary impact, mature plants that are removed must be replaced with mature plants. Moreover, impacts to areas significantly disturbed during the construction process, in which an existing plant community in equilibrium with its environment is removed and replaced by a new community that will require significant monitoring and management, must be considered a permanent impact. This is especially true if the biotic and abiotic environment are significantly altered (e.g. changes in soil substrate, water temperature, light regime). The threshold for temporary vs. permanent impact is for a community to fully restore within the space of a year.

SA2-42 | Permanent impacts to wetlands must be mitigated at a ratio of 4:1. 1:1 may be implemented on site. 3:1 must be implemented in a nearby location of similar ecosystem type unless other arrangements (e.g. in-lieu fees) are negotiated. Mitigation ratios for enhancement vs. restoration must also be negotiated by relevant parties. Please submit the referenced (pg. 2-162) Wetlands Only Practicable Finding portion of the EIR as soon as possible so that this important element of the project – wetland mitigation – can be negotiated to the satisfaction of all parties before construction is scheduled to begin.

SA2-43 | Grazing is considered to be a deterrent for nesting and foraging of migratory bird species, and special status bird species, including the Peregrine falcon and tricolored blackbird (both observed in the project area). Grazing may have also restricted the growth of riparian vegetation. This area is home to the MSB, a severely restricted species. Given the perceived lack of proper mitigation sites, the strong desire of at least some residents for restoration of Scotty Creek, and the impact of grazing, one mitigation should be an easement prohibiting grazing within the BSA as part of the package of mitigation options. Alternatively, if limited grazing is thought to be beneficial towards promoting plants that support MSB and other sensitive species, then grazing should be implemented in a targeted and managed way. The growth of riparian trees and the establishment of a real riparian buffer would also reduce the level of agricultural/grazing related

SA2-43 | impacts to Scotty Creek and could result in greater stream complexity. Greater stream (cont'd) | complexity would benefit steelhead trout and potentially Coho salmon.

SA2-44 | Buffers for construction set at least 50 feet from bird nests and badger burrows should be specified. The EIR should also note that badgers do sometimes forage during the day.

Water Quality

SA2-45 | The DED defers a significant portion of the water quality analyses to future permitting requirements. For example Measure Water-5 states that “The 401 Certification will detail specific permanent impacts to waters of the State, require actions to avoid and/or minimize impacts, as well as mitigation efforts to enhance or restore these areas.” Another example is “Under all Build Alternatives, the proposed project could adversely affect Scotty Creek, due to temporary fill resulting from installation of a temporary cofferdam for removal of the existing box culvert. As a result, a 401 Certification would be required.” A complete assessment of specific impacts and required mitigation must be included in the DED and cannot be deferred to future studies.

SA2-46 | The discussion of the regulations protecting water quality under the Clean Water Act (DED 2.2.2) should be amended to include the role of the Coastal Commission. Because the project is located within the coastal zone, it should be recognized that California’s Nonpoint Source Pollution Control Program addresses federal requirements under both the Clean Water Act and the Coastal Zone Management Act (Section 6217 of the Coastal Zone Act Reauthorization Amendments of 1990) by implementing California’s Coastal Nonpoint Pollution Control Program on a statewide basis. The lead State agencies responsible for implementing California’s Program are the SWRCB (designated as the lead water quality agency) along with the nine Regional Water Boards and the Coastal Commission (designated as the lead coastal zone management agency). Through its policies, the California Coastal mandates the protection and restoration of water resources in the coastal zone, including that of water quality (Sections 30230 and 30231 of the Coastal Act).

SA2-47 | For purposes of protecting and where feasible restoring coastal water quality, this would mean treating 100% of the project runoff that flows to coastal waters to the highest level possible. Although the DED mentions that biofiltration will be used to minimize impacts, the DED should specifically state how much stormwater will be treated by these features and what portion of stormwater runoff is expected to be infiltrated. The design treatment should include runoff from all areas included in the project listed as impervious per Table 2-14. The DED should discuss the project setting and site hydrology to determine the maximum amount of runoff that can be infiltrated on the coastal terrace. It would almost certainly be appropriate to expect infiltration of runoff up to and including the 95th percentile design storm.

SA2-48 | A schematic of the biofiltration swales and biofiltration strips should be included in the DED in order to illustrate how they function to improve water quality in highway runoff. A description should include the nature of the soils, soil amendments to be used and vegetation to be

- SA2-48 (cont'd) | incorporated in each type of treatment. The descriptions should also illustrate how “sideslopes and existing natural ditches’ are expected to be used in constrained areas to treat runoff from the highway. To complete the description of the mitigation measure, short and long term maintenance of each type of stormwater treatment feature should be documented so that each would continue to function effectively in perpetuity.
- SA2-49 | The DED should include a comparison of each alternative’s impact on water quality. One alternative would add 3.5 acres while another would add only 3 acres. The area that adds the least impervious surface would be the preferred alternative because it would minimize change increases in the volume of runoff and duration of runoff peaks, in addition to minimizing the transport of sediment and other pollutants in stormwater runoff from the completed facility. It would also be important to consider how much of the old highway surface could be eliminated within the project boundaries as part of this alternatives analysis.
- SA2-50 | Minimizing impervious surface is a fundamental site design measure that would minimize the project’s impact on site hydrology, and is considered to be a Low Impact Development technique. LID techniques are to be prioritized in accordance with the NPDES permit (Order No. 2012-0011-DWQ) which has been referenced as the applicable NPDES permit in the DED. Other site designs options to reduce the addition of impervious surface or to break up the impervious surface area should also be considered in the DED. This may include options to reduce road and shoulder widths, incorporate permeable pavements, or provide a permeable median or gore areas and eliminating or reducing current highway pavement.
- SA2-51 | It is stated that the proposed paved area is small compared to the whole of the watershed and the change in runoff is insignificant. The project crosses seasonal wetlands that are highly susceptible to impacts from very small changes in runoff. The amount of runoff that supplies each wetland pre-project should remain the same post-project. The drainage patterns should be preserved, and all highway and bridge runoff should be treated before it enters the wetlands. Where the road alignment crosses wetlands, the road prism should be as hydrologically invisible as possible in order to preserve water supply and circulation within each wetland. Where the roadway would be elevated on a bridge above a wetland or the Scotty Creek drainage, it will be important to design the bridge so that runoff from the bridge deck can be routed to land-based BMPs for treatment and infiltration. Untreated runoff from the bridge should not be allowed to directly enter Scotty Creek lagoon or other important coastal wetlands. Alternative bridge drainage and BMP options should be discussed in the DED. The bridge drainage design and water quality BMP options should be contemplated early in the project design phase.
- SA2-52 | In Section 2.2.1 Hydrology and Hydraulics, it is stated that “Because the proposed project is not within a 100-year designated floodplain, the proposed project has no impact to the 100-year floodplain.” and “There are no designated 100-year floodplains within the EIR/EA study area.” The DED should clarify that there are no Federal flood insurance requirements associated with Scotty Creek or the Scotty Creek floodplain and also detail the impacts that will occur to Scotty Creek with each alternative.
- SA2-53 | Finally, the EIR/EA should clearly identify the water needs of the project construction activities and explain the source, quantity and proposed delivery of that water, including any measure to

SA2-53 | minimize the amount of water required.
(cont'd)

Thank you for working closely with Commission staff on this project, and for providing us the opportunity to comment on the draft EIR. We look forward to continuing to collaboratively work with Caltrans on this important public works project and are available to answer any questions that you may have regarding these comments.

Sincerely,



Nancy Cave
District Manager
North Central Coast District
California Coastal Commission

Cc: Dean Parsons, Sonoma County
Tami Grove, Coastal Commission
Ethan Lavine, Coastal Commission

Response to Comment Letter SA2: California Coastal Commission

Response SA2-1	Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Your comments are addressed below. Your support for the project is noted.
Response SA2-2	Caltrans has developed a project that is consistent with environmental policies, including the Coastal Act, while addressing the underlying purpose and need. See Table 2-2, California Coastal Act – Public Resources Code Division 20, and Table 2-3, Sonoma County Local Coastal Program, in this Final EIR/EA with FONSI which outline key provisions of the Coastal Act and the Sonoma County LCP, respectively. Details of Coastal Act compliance and consistency will be provided as part of the Coastal Development Permit (CDP) application.
Response SA2-3	Caltrans is coordinating with the Coastal Commission and Sonoma County to determine the appropriate CDP review process and to ensure consistency with the LCP. During the permitting phase of this project, the project components discussed in the Final EIR/EA with FONSI will be finalized and Caltrans will coordinate closely to satisfy the Coastal Commission and Sonoma County permit requirements.
Response SA2-4	Caltrans appreciates this guidance and will continue to coordinate with the Coastal Commission and Sonoma County to determine the appropriate CDP review process.
Responses SA2-5 and SA2-6	Caltrans will determine this process through coordination with the Coastal Commission and Sonoma County.
Response SA2-7	<p>Caltrans' long-term plan for this area is to protect SR 1 from coastal erosion and to provide continued access to the area as it is the only connection between the coastal communities of Bodega Bay and Jenner.</p> <p>The proposed access roads would provide access to the remaining property owners and the coast. Three separate roads are needed because the following three barriers will be created as a result of the proposed project: 1) the Scotty Creek culverts and roadway would be removed; 2) the section of the existing State Route (SR) 1 near the soldier pile wall is expected to erode away in the near future; and a contingency measure should be considered, and 3) the northern section of the existing alignment does not connect to SR 1 to the north because the resulting small angle formed at the intersection creates safety concerns as it would be difficult for vehicles to see approaching vehicles/bikes while turning from the existing alignment.</p> <p>In terms of the existing SR 1 roadway, Caltrans will continue to maintain the alignment until new agreements are made with other agencies. Caltrans will maintain the existing roadway access to property owners, irrespective of the presence or absence of a structure on such a property.</p> <p>The California Coastal Trail (CCT) is coincident with existing SR 1 throughout the project limits. Project implementation would enhance recreational access, given that the new SR 1 would feature widened shoulders, and a sidewalk on the new bridge, to accommodate bicyclists and pedestrians traveling through the proposed project area. Caltrans would also construct a pedestrian and bicycle bridge over Scotty Creek, if feasible, that would connect the northern and southern remnants of SR 1 following removal of the box culverts.</p> <p>The former alignment or remnant highway could provide additional Coastal Trail alignments in the future depending on bluff retreat and coastal erosion. Additionally, grinding and overlay of the existing SR 1 surface, if necessary, is part of the project's scope of work.</p> <p>A full alternatives analysis was provided in Chapter 2 of the Draft EIR/EA. Based on that alternatives analysis and input from the public, Alternative 19A was selected as the Preferred Build Alternative. Caltrans will provide an alternatives analysis under the requirements of the Coastal Act in the subsequent CDP application.</p> <p>Lastly, the plan for the remnant land between the existing highway and the new realigned highway as it relates to coastal access considerations and protection of sensitive resources will be determined during the permitting process and right-of-way coordination.</p>
Response SA2-8	Based on slope stability analysis, 20 to 25 feet will be used as the safe distance from a structure with slope of 1.5 feet high to 1 vertical foot and a safety factor of 1.5. This is estimated based on the assumption that the bluff near the project site is approximately 70 feet high. Slope stability depends highly on the height of the bluff, the cut slope angle, the soil/rock properties, and groundwater seepage. Therefore, the safe distance in question varies depending on the location. A conservative value of 70 feet high was used for the bluff. Further refinements will be made to this analysis as the project design is further refined following the environmental review phase.

- Response SA2-9 There is existing erosion/slipout along existing SR 1 from the Scotty Creek culverts to 145 feet south, which is undermining the toe of the embankment slope and creating a vertical drop of about 8 to 12 feet in the southbound direction. Some of the existing rock slope protection (RSP) around the headwall outlet of Scotty Creek has been buried in sand or washed away. This will be repaired and replaced as needed with RSP or other feasible shoreline protection. If addressed by repairing the RSP, this would be done by excavating the loose slide material at the bottom of the slide, excavating a 5-foot-deep shear key and backfilling with 2-ton and ½-ton (Method A) RSP over RSP fabric with a side slope of 1.5:1.
- The RSP installation will extend south along existing SR 1 to protect the roadway, access to a private driveway, and public beach access. The proposed RSP (or other feasible shoreline protection) has been added to Table 2-2, California Coastal Act – Public Resources Code Division 20, and Caltrans will provide a separate Alternatives Analysis in its CDP application, per Coastal Act Section 30235.
- Response SA2-10 The proposed replacement or repair of RSP (or other feasible shoreline protection) is necessary to maintain access to the affected properties and to protect the existing roadway. Caltrans will consider options including RSP or other feasible shoreline protection in an effort to minimize environmental impacts. The proposed RSP would be located almost entirely on Caltrans right-of-way, with a minor encroachment on private land. The proposed RSP would not encroach onto the public beach. This information has been included and clarified in the Summary and Section 1.3, Project Description.
- The CDP application will provide a full analysis per Section 30235 of the Coastal Act.
- Response SA2-11 A sea level rise (SLR) impact assessment was included in Section 3.2.6, Climate Change, of the Draft EIR/EA. In this evaluation, the risk assessment consisted of assessing the likelihood of an event occurring in the future and the magnitude of SLR consequences. From this risk assessment, the risk of bank erosion and bridge scour hazards were determined to be low, and the adaptive capacity of the new bridge to these hazards was determined to be high.
- The bridge design, including deck height and pier depth, reflects current sea level conditions and the high sea level rise scenario modeled, which is 4.6 feet in 2100. The maximum scour depth was estimated as 8.8 feet, and occurs during the present day scenario. This is because the water surface elevation is lower, yielding a higher flow velocity for the same peak flow rate.
- If SLR is greater than current projections, adaptive management to protect the bridge could include placement of additional RSP or other feasible protection at the piers and abutments (if SLR is sufficient to reach the abutments). In addition, greater wave elevations could be managed by adding additional height to the barriers on the seaward side of the bridge.
- Response SA2-12 The proposed project is designed within the context of models that provide guidance about expected coastal erosion and SLR rates over the rest of this century. The project has been designed to year 2100 based on coastal bluff retreat estimates.
- Response SA2-13 Caltrans supports efforts to enhance public access and has worked closely with related agencies and the public to include pedestrian and bicycle access on the new SR 1 alignment as well as a pedestrian/bicycle bridge over Scotty Creek, if feasible. The dimensions of the elevated bridge have been modified from what was described in the Draft EIR/EA to more safely accommodate multimodal transit. The updated proposed bridge is planned to be 49 feet wide with a 6- to 8-foot shoulder and 6-foot sidewalk in the southbound direction and a 6- to 8-foot shoulder in the northbound direction. These shoulder dimensions would be wider than shoulders along the existing SR 1 alignment and would better allow for multimodal use of the project corridor compared to existing conditions.
- Details relating to the CDP will be determined as part of the permit coordination.
- Response SA2-14 Caltrans supports efforts to enhance public access and has worked closely with related agencies and the public to include pedestrian and bicycle access on the new SR 1 alignment, and the project would now include construction of a pedestrian and bicycle bridge over Scotty Creek, if feasible. Additional discussion of public access accommodations has been added to Table 2-2, California Coastal Act – Public Resources Code Division 20. CCT details relating to the CDP will be determined as part of the permit coordination. The CDP Application will provide a full alternatives analysis of public access accommodations consistent with the Coastal Act.
- Response SA2-15 Implementation of Alternative 19A, including removal of the Scotty Creek culverts, would result in the loss of about 12 informal parking spaces located along existing SR 1. This loss of parking would be offset by construction of a parking pad north of Scotty Creek that would accommodate up to 12 vehicles. South of Scotty Creek, the existing SR 1 shoulders and informal parking areas would remain as-is.

- Response SA2-16 South of Scotty Creek, the parcels are privately owned and therefore beach access cannot be proposed at these locations. The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location option for the project to provide beach access. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. The proposed RSP or other feasible shoreline protection would extend south along existing SR 1 and has been designed to minimize environmental impacts. This feature will be further refined during the CDP process.
- Response SA2-17 As a result of Caltrans' evaluation of potential environmental impacts associated with the three alternatives discussed in the Draft EIR/EA and public input, Alternative 19A was selected as the Preferred Build Alternative. Alternative 20, which would have included construction of a retaining wall south of Scotty Creek is no longer being considered.
- Response SA2-18 Implementation of Mitigation Measure VISUAL-1: Reduce Shoulder Widths, which would result in shoulders with 4 feet of paved surface and 4 feet of unpaved surface, would occur on non-bridge portions of the proposed new SR 1 alignment. On the bridge, a wider shoulder is warranted as the bridge rail would be a vertical element that would block users' ability to see the road ahead on curves. A wider shoulder would allow for increased sight distance. In addition, a wider shoulder would increase safety on the bridge compared to existing conditions as there are currently no emergency escape areas for bicycles, pedestrians and vehicles on the existing bridge over Scotty Creek.
- Based on Caltrans design standards, due to the horizontal curves at each end of the proposed new bridge, a 15-foot to 16-foot shoulder is required at the southern end and a 10-foot shoulder is required at the northern end. The Draft EIR/EA proposed 8-foot shoulders on the bridge. These have now been further reduced to as little as 6 feet at certain locations on the bridge, resulting in a decrease of 2 feet compared to the shoulder width identified in the Draft EIR/EA.
- The CCT is coincident with existing SR 1 throughout the project limits. Project implementation would enhance recreational access, given that the new SR 1 would feature widened shoulders and a sidewalk on the new bridge to accommodate bicyclists and pedestrians traveling through the proposed project area. Caltrans would also construct a pedestrian and bicycle bridge over Scotty Creek, if feasible, that would connect the northern and southern remnants of SR 1 following removal of the box culverts.
- Response SA2-19 Temporary impacts to vegetation are considered those that will be addressed through reseeding and monitoring and will not be permanently altered due to development. This is consistent with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) use of the term "temporary." Coastal Act and LCP definitions of temporary and permanent impacts will be addressed in the CDP application.
- Response SA2-20 Access roads and other project features such as the bridge were designed to avoid as many sensitive areas as possible, including patches of western dog violet (*Viola adunca*), while meeting the purpose and need of the proposed project and addressing all of the existing constraints on the landscape.
- Restoration and grazing management will be determined in coordination with landowners and as part of the permitting phase of the project. Decisions will factor in the relative impacts to sensitive species, habitats, and agricultural lands.
- Access roads have been designed to provide access to the coast while avoiding sensitive resources and areas vulnerable to coastal erosion.
- Speed limits as well as other measures to avoid impacting wildlife during construction will be determined as part of the permitting phase of the project.
- Response SA2-21 The project includes best management practices related to noise. Nighttime construction will be avoided (see Measure NOISE-1 in Appendix F, Avoidance, Minimization, and/or Mitigation Measures).

Response SA2-22	<p>No substantial temporary or periodic increase to ambient noise levels is expected in the project vicinity. Construction-related noise and human activity levels may temporarily deter wildlife from the project area. This information has been added to the Final EIR/EA with FONSI in Section 2.3.4, Animal Species.</p> <p>The most common types of equipment generate maximum noise levels in the range of 80 to 85 A-weighted decibels (dBA) at a distance of 50 feet. Some equipment, such as concrete saws, jackhammers, and pavement scarifiers, produce louder noise levels of 90 dBA. Louder equipment including pile drivers, sand blasters, and hoe rams are not anticipated to be used on this project. For the most part, construction activities (assuming multiple pieces of equipment operating simultaneously) are anticipated to generate noise levels of 74 to 80 dBA at a reference distance of 50 feet.^[1] Maximum levels might reach 90 dBA at 50 feet.</p> <p>There is little evidence to assess the stress or physiological effects of man-made sounds on birds. There is no specific noise criterion to judge temporary construction noise impacts to birds. No effects to pinnipeds are expected due to the low levels of noise being generated, the distance to the nearest haul-out location, and the masking noise of ocean waves.</p> <p>There are no sensitive wildlife receptors within the BSA that would be expected to be affected by project-related noise.</p>
Response SA2-23	<p>Caltrans has been working with a qualified entomologist (familiar with the Myrtle's silverspot butterfly [MSB], its local and regional distribution and natural history) on this project since 2010. The project is not expected to render the project area unsuitable for the MSB. Habitat and species surveys of the project area and some adjacent areas have been conducted to provide a better understanding of the value of the project location to the butterfly (see Section 2.3.5, Threatened and Endangered Species), to inform project development, to minimize impacts where feasible, and to appropriate and effective mitigation. The measures listed in the Final EIR/EA with FONSI have been revised to reflect USFWS's Biological Opinion (USFWS 2016b) and adequately address the impacts to, and commensurate mitigation for, MSB. Mitigation locations and timing will be determined during the permitting process of the project phase.</p> <p>Mitigation specific to MSB will be refined through Section 7 consultation with USFWS and interagency mitigation discussions.</p>
Response SA2-24	<p>The project includes measures to protect and avoid the western dog violet (<i>Viola adunca</i>) where feasible as part of Myrtle's silverspot butterfly avoidance measures, such as with flagging and fencing during construction activities. Nectar plants are more prolific and cannot be completely avoided; however, the project activities will be constrained to minimize impacts to native vegetation as well as other biological resources. The measures listed in the Final EIR/EA with FONSI have been revised to reflect USFWS's Biological Opinion (USFWS 2016b). Please see the Avoidance, Minimization, and/or Mitigation Measures in Section 2.3.5, Threatened and Endangered Species.</p>
Response SA2-25	<p>Avoidance measures have been refined to reflect the USFWS's Biological Opinion (USFWS 2016b) and to limit project impacts to the Myrtle's silverspot butterfly. The construction activities have a low probability of resulting in the fatality of adult butterflies because construction vehicles will be limited to speeds of 5-10 mph in the project area and because of the mobility of adult butterflies. Pre-construction surveys will be conducted and western dog violet (<i>Viola adunca</i>) that support larvae will be avoided wherever possible.</p> <p>The project is not expected to affect the wind regime as no tall structures or trees will be removed.</p>
Response SA2-26	<p>The potential for conservation easements has been recognized and will be evaluated during the permitting phase of project development when Caltrans is authorized to actively engage landowners about potential land agreements. Avoidance, minimization, and/or mitigation measures have been refined to reflect the USFWS's Biological Opinion (USFWS 2016b).</p>
Response SA2-27	<p>A qualified entomologist has been involved in developing environmental constraints mapping and informing the development of project avoidance, minimization, and/or mitigation measures. These measures have been refined to reflect the USFWS's Biological Opinion (USFWS 2016b).</p>
Response SA2-28	<p>Site selection will occur through coordination with regulatory/resource agencies including USFWS. Specific ratios will depend on site availability and resource agency input. Avoidance, minimization, and/or mitigation measures have been refined to reflect the USFWS's Biological Opinion (USFWS 2016b). Mitigation details will be determined during the permitting process of the project phase.</p>

[1] A reference distance is used to model noise from these sources at much greater distances, recognizing that the equipment is spaced apart.

- Response SA2-29 A qualified entomologist has been involved in developing the avoidance, minimization, and/or mitigation measures, and these measures have been further refined since the Draft EIR/EA to reflect the USFWS's Biological Opinion (USFWS 2016b) (see Section 2.3.5, Threatened and Endangered Species).
- Response SA2-30 The California red-legged frog (CRLF) may disperse throughout the project area, though it is most likely to occur within 200 feet of Scotty Creek based on scientific studies along similar coastal habitats. This is described in Section 2.3.5, Threatened and Endangered Species and is noted on Figure 2-22, Project Effects on Myrtle's Silverspot Butterfly Habitat.
- Overall, the roadway realignment project is unlikely to reduce the potential for the action area to support the CRLF. The project is likely to improve the overall environmental baseline for the frog within the action area. The general project vicinity is also largely undeveloped and will continue to provide an adequate amount of upland habitat following construction. This is described in Section 2.3.5 and is noted on Figure 2-22.
- Response SA2-31 The project area will remain open to California red-legged frog movement, and no substantial effect to dispersal is expected because the realignment includes a bridge that spans Scotty Creek and its floodplain. By elevating the roadway in this area, the project would avoid the area with the greatest potential for conflict with dispersing frogs. CRLF are most likely to occur along and within 200 feet of the creek based on scientific studies (e.g., Fellers and Kleeman 2007 and Bulger et al. 2003). Avoidance, minimization, and/or mitigation measures have been updated to reflect the USFWS's Biological Opinion (USFWS 2016b).
- Response SA2-32 Project effects to the California red-legged frog are expected to be minimal as the project is designed to avoid roadway conflicts with the frog and other species that may use Scotty Creek and the surrounding floodplain. Avoidance and minimization measures for the frog reflect the USFWS's Biological Opinion (USFWS 2016b). Mitigation details including enhancement locations and ratios will be refined in the permitting phase of the project development.
- Response SA2-33 The project does not plan to restore the temporarily impacted ruderal habitat to ruderal habitat. The areas will be planted with locally appropriate native species that have been identified as having the greatest opportunity to become established and subsist in the given location and conditions. The potential for continued disturbance is noted and will be accounted for in the revegetation and monitoring plan that will be developed pre-construction and implemented during and after construction. Avoidance, minimization, and/or mitigation measures reflect the USFWS's Biological Opinion (USFWS 2016b).
- Response SA2-34 The project plans to mitigate any loss to sandy beach and temporarily impacted areas will be restored to their pre-project condition, to the extent practicable. Mitigation details will be further refined as part of the CDP coordination.
- Response SA2-35 Caltrans is a steward of the environment and the objective of revegetation efforts will be to establish native vegetation that will support native wildlife. Specific species and criteria will be developed in concert with the appropriate resource agencies, as needed, during the permitting phase of the project.
- Response SA2-36 The project will incorporate fencing to protect environmentally sensitive areas (ESAs) during the final project design. Fencing will accommodate protection of species as well as compliance with the Stormwater Pollution Prevention Plan. Maps of ESA fencing will be provided to the Coastal Commission for review prior to construction and will conform to the USFWS Biological Opinion (USFWS 2016b), CDP, and other applicable permits.
- Response SA2-37 Biological monitors will be assigned to the project in accordance with Measures BIO-7: Pre-construction Wildlife Surveys and BIO-8: Biological Monitoring presented in Section 2.3.4, Animals Species.
- Response SA2-38 The project will minimize impacts to coastal prairie by revegetating temporarily disturbed areas with locally appropriate native plants, as described in Measure BIO-1: Re-vegetation. Suitable off-site mitigation locations and practices will be reviewed and refined during the permitting stage of the project.
- Response SA2-39 The project has been designed to limit impacts on Scotty Creek by spanning a bridge across Scotty Creek and its floodplain and most of its adjacent wetlands (see Table 2-20, Temporary and Permanent Effects on Wetlands and Waters). This design will minimize direct permanent adverse effects to wetlands and other waters. Planting and grazing management will be considered and discussed with the appropriate resource agencies and landowners during the permitting phase of the project.

- Response SA2-40 Project-related removal of and disturbances to wetlands are not expected to affect the wetlands' ability to tolerate shade and to transition to more shade-tolerant dominant vegetation. Temporarily disturbed areas will be restored and monitored over an appropriate timeframe based on applicable project permits.
- Response SA2-41 Temporary impacts to vegetation are considered those that will be addressed through reseeded and monitoring and will not be permanently altered due to development. This is consistent with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) use of the term temporary. Coastal Act and LCP definitions of temporary and permanent impacts will be addressed in the CDP application.
- Response SA2-42 The precise mitigation ratio for permanent impacts to wetlands will be decided as part of permitting. The wetlands only practicable alternative finding is included in the Final EIR/EA with FONSI in Section 2.3.2, Wetlands and Other Waters.
- Response SA2-43 Thank you for the suggestion relating to grazing management. The project integrates avoidance measures into the project design and construction plans to limit project impacts to the Myrtle's silverspot butterfly commensurate with the proposed projects impacts. Managed grazing may be a component of maintaining suitable habitat conditions for the Myrtle's silverspot butterfly host plant. These elements will be considered and discussed with the appropriate resource agencies during the permitting phase of the project.
- Response SA2-44 The project incorporates buffers around bird nests and badger dens (see Measure BIO-7: Pre-construction Wildlife Surveys in Section 2.3.4, Animal Species). The measure has been modified to note the daytime foraging patterns of the badger.
- Response SA2-45 The Draft EIR/EA includes the full assessment of impacts and discusses mitigation as related to waters and wetlands of the State. The assessment included in the document describes the greatest extent of impacts at the current design phase. Further design details are required before the Section 401 permit can be filed. Further study will not be deferred, but rather refined as part of the Section 401 permit process. Further development of the design will clarify what temporary and permanent impacts would result to various environmental resources.
- Response SA2-46 Since the Draft EIR/EA circulation, Table 2.2, California Coastal Act – Public Resources Code Division 20, has been modified to include these regulations protecting water quality under the Clean Water Act and the role of the Coastal Commission.
- Response SA2-47 Permanent stormwater treatment efforts for this project will comply with Caltrans' National Pollutant Discharge Elimination System (NPDES) Statewide Storm Water Permit (Order No. 99-06-DWQ). The design treatment measures will treat impervious surface runoff to the maximum extent practicable with the goal of treating an area equal to the newly created and replaced impervious surface. These measures will be designed to meet Caltrans' sizing criteria for stormwater treatment and, as applicable, local Low Impact Development (LID) sizing criteria. The amount of impervious surface treated and infiltration achieved will be calculated during the design phase when the drainage design has been developed and geotechnical investigation has been performed to evaluate existing infiltration or permeable characteristics of the soil. (Note: LID is an approach to land development with the goal of mimicking or replicating the pre-project hydrologic regime through the use of design techniques to create a functionally equivalent hydrologic site design.)
- Response SA2-48 The use of existing soils or need for amendments will be determined during the design phase when detailed soil investigation is performed to characterize the native soils. Soil amendments could include incorporating simple compost or using a specific engineered soil mix to be specified and approved during the design process. Treatment using side slopes and existing natural ditches is achieved through the process of natural dispersion, which considers infiltration provided by the soils in its existing condition. Caltrans has developed guidance for short- and long-term maintenance of stormwater treatment features, and either Caltrans personnel will follow this guidance, or operation and maintenance agreements will be accepted and approved before contract acceptance, to ensure that either Caltrans maintenance or local/countywide maintenance guidelines are followed.

- Response SA2-49 The amount of added impervious surfaces is one of several environmental factors considered in the identification of the Preferred Build Alternative. Alternative 20, which had the least impervious surfaces added (3.0 acres), was eliminated from further consideration due to additional considerations including the amount of permanent wetland impacts (see Section 2.3.2, Wetlands and Other Waters). Alternative 19A was selected as the Preferred Build Alternative, and it has less added impervious surfaces compared to Alternative 19B. Table 2-14, Soil Disturbance and Increased Impervious Area (acres), summarizes the impervious surfaces that would be removed by the project (e.g., the culvert removal, etc.). An intent of the project is to ensure that as much of the existing SR 1 as possible remains accessible for public access after the proposed SR 1 segment is built.
- Response SA2-50 Minimizing impervious area was considered during preliminary design to the extent feasible. During the more detailed design process and permitting phase, after the Final EIR/EA with FONSI is certified, more refined options and measures will be considered to reduce adding impervious surface or to break up impervious surface area including design LID measures.
- Response SA2-51 The goal of the drainage design will be to maintain existing drainage patterns, including runoff rates to seasonal wetlands, to the extent practicable. These drainage features will be developed as part of the drainage design, and could include flow detention or metering, offline systems, or dual systems to convey flows greater than the existing condition. The drainage design for areas discharging to wetlands also will be reviewed during the permitting process after the Final EIR/EA with FONSI is certified, to comply with regulatory agency requirements or conditions. Early on during the design phase, consideration for placement of stormwater treatment measures will prioritize areas where runoff will enter wetlands, Scotty Creek, and other sensitive areas.
- Response SA2-52 Since the Draft EIR/EA circulation, Section 2.2.1, Hydrology and Floodplain, has been modified to clarify that no federal flood insurance requirements are associated with Scotty Creek or the Scotty Creek floodplain. Scotty Creek is located within the hydrologic study area and the Environmental Consequences subsection in Section 2.2.1 includes an assessment of the Preferred Build Alternative's impacts on Scotty Creek. The section concludes with the Avoidance, Minimization, and/or Mitigation Measures subsection that states "Under the Build Alternative, no adverse effects would result to the floodplain and hydrologic study area; therefore, no avoidance, minimization, or mitigation measures are proposed related to flooding hazards."
- Response SA2-53 Estimated water usage during project construction will be calculated as the project design is more fully refined and once all construction activities/quantities have been determined. To ensure that water conservation is properly addressed, specifications and special provisions will be included in the construction contract during the design refinement phase. Depending on the water conservation requirements in place at the time of construction, these measures include restricting the use of potable water, restricting the use of water for compaction and for the alleviation of dust, and limiting vehicle washings. Water would be delivered to the site by the contractor, similar to other materials needed for the project. The source of water would be determined by the contractor, but non-potable water sources are located in Petaluma, Santa Rosa and Sonoma.
- Response SA2-54 Caltrans would like to thank you for taking the time to participate in the public outreach process. Your support for the project is noted.

Letter SA3

From: Thompson, Brendan@Waterboards <Brendan.Thompson@waterboards.ca.gov>
Sent: Friday, August 21, 2015 3:39 PM
To: Gleason Realignment@DOT
Cc: Bargsten, Stephen@Waterboards; Blatt, Fred@Waterboards; Lee, Shin-Roei@Waterboards; state.clearinghouse@opr.ca.gov; Takhar, Hardeep@DOT; Vafai, Cyrus@DOT; Sandeck, Michael@Coastal; Costa, Holly N SPN; Escaron, Melissa@Wildlife; Iberien, Oliver@DOT
Subject: SCH#2011022002 SON1 Gleason Beach DEIR Regional Water Board Comment Letter

Dear Mr. Iberien,

Thank you for providing the North Coast Regional Water Quality Control Board (Regional Water Board) with an opportunity to comment on the State Route 1 Gleason Beach Roadway Realignment Project Draft Environmental Impact Report, dated June 2015 (Draft EIR) (SCH# 2011022002). We offer the following comments so that Caltrans may address our concerns at this early stage of project development.

Wetland Hydrology

There are two large wetland areas that would be bisected by the new highway alignment. We are pleased that Caltrans has taken the opportunity to avoid and minimize impacts to these wetlands by designing the Scotty Creek Bridge to span these wetlands using pier abutments.

Project Alternatives

SA3-1

Project Alternatives 19A, 19B, and 20 would result in approximately 0.93, 0.55, and 1.07 acres, respectively, of permanent impacts to state waters. While we greatly prefer alternative 19B in terms of lower permanent wetland impacts, we are concerned that alternative 19B would also result in approximately 6.9 acres of permanent impact to Myrtle’s silverspot butterfly habitat, whereas alternative 20 would result in approximately 5.7 acres. While protection of the silverspot butterfly is not subject to our permitting authority, we encourage Caltrans to identify further opportunities to avoid and minimize permanent impacts to silverspot butterfly habitat within the 19B alternative.

Mitigation for Wetland Impacts

SA3-2

Page 2-162 of the Draft EIR provides only two mitigation options for wetland impacts: in-lieu fees and mitigation banks. Note that there are currently not any local mitigation banks or in-lieu fee programs that may provide mitigation acceptable to the Regional Water Board.

Before we may issue 401 certification for the project, Caltrans must provide a mitigation and monitoring plan found acceptable to the Regional Water Board that includes, but not limited to, the following:

SA3-3

- 1) The areal and linear footage extent of proposed mitigation;
- 2) The exact location of the mitigation;
- 3) A detailed description of the mitigation proposal with accompanying monitoring protocol and performance criteria; and
- 4) A timeline for mitigation implementation.

SA3-4

We encourage Caltrans to identify mitigation opportunities along Scotty Creek. Significant water quality benefits would be realized by planting riparian vegetation along the creek and restricting grazing access. Any application for 401 certification must fully evaluate potential mitigation options at Scotty Creek

SA3-4
(cont'd)

before the Regional Water Board may consider mitigation at other locations. The Regional Water Board will consider accepting out-of-kind mitigation for mitigation at Scotty Creek.

SA3-5

Post-Construction Stormwater Treatment

The DEIR did not provide specific storm water drainage or post-construction storm water treatment information. The Regional Water Board is concerned that roadway pollutants may be transported in stormwater runoff to the adjacent wetlands and the restored Scotty Creek estuary. Accordingly, Caltrans must design the project to treat stormwater from all impervious areas draining to Scotty Creek or state wetlands.

Thanks again for this opportunity to comment. Feel free to contact me if you have any questions.

Brendan Thompson, CPESC, QSD
Environmental Scientist
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403-1072
(707) 576-2699

Response to Comment Letter SA3: North Coast Regional Water Quality Control Board

- Response SA3-1 Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Your support for the project is noted. Your comments are addressed below.
- As a result of Caltrans' evaluation of potential environmental impacts associated with the three alternatives discussed in the Draft EIR/EA as well as public input, Alternative 19A was selected as the Preferred Build Alternative. Alternative 19A is the least environmentally damaging alternative for a range of environmental resources. As Alternative 19A is further refined in the design phase of the project, further reduction of impacts could be possible, which would be reflected in the Section 401 Water Quality Certification application.
- Response SA3-2 As part of the permitting phase of the project, Caltrans will coordinate with all appropriate resource agencies regarding on- and off-site mitigation options. Caltrans is exploring available mitigation options, including participation in or funding of mitigation in coordination with local, state, and/or non-profit organizations.
- Response SA3-3 The requested information, including mitigation and monitoring plan, will be provided as part of the project's Section 401 Water Quality Certification application.
- Response SA3-4 As part of the permitting phase of the project, Caltrans will coordinate with the Regional Water Quality Control Board and other resource agencies regarding on- and off-site mitigation options. Caltrans is exploring available mitigation options, including participation in or funding of mitigation in coordination with local, state, and/or non-profit organizations. Although not a mitigation requirement commensurate with impacts to this project, Caltrans will be coordinating with resource agencies as part of the permitting phase of the project to review opportunities for improving streambed conditions within Scotty Creek.
- Response SA3-5 Permanent stormwater treatment efforts for this project will comply with Caltrans' NPDES Statewide Storm Water Permit (Order No. 99-06-DWQ). The design of stormwater treatment measures will meet the sizing criteria stated in the Caltrans *Project Planning and Design Guide* (2010), and as applicable, the County's *Storm Water Low Impact Development Technical Design Manual* (2011). The stormwater treatment measures will treat impervious surface runoff to the maximum extent practicable with the goal of treating an area equal to the newly created and replaced impervious surface.



COUNTY OF SONOMA
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

August 24, 2015

CalTrans District 4
Attn: Oliver Iberian
111 Grand Avenue
Oakland, CA 94612

Re: **Draft EIR Comment Letter**, State Route 1 Gleason Beach Roadway Realignment Project
PM 15.1/15.7
EA 04-0A0200/EFIS 04-0000-0129

Dear Oliver,

LJ1-1

This letter serves as the Sonoma County Permit and Resource Management Department (PRMD) comment letter on the Draft EIR (DEIR) dated June 2015 for the Highway 1 realignment project at Gleason Beach. We appreciate the opportunity to comment on this important public project. The comments are organized by the most appropriate topic, although many comments apply to more than one topic or issue area.

LJ1-2

Significant and Unavoidable Impacts

1. The DEIR concludes that the project will result in significant and unavoidable impacts in three areas: Aesthetics, Cultural Resources, and Land Use and Planning. The DEIR should include more discussion and balancing of the project objectives of applying typical engineering design standards versus scenic and historic impacts and values. The comments in this letter regarding the boardwalk beach access and bridge design should be incorporated as appropriate to the project design and/or mitigation measures to reduce the impacts in these areas.

LJ1-3

Local Coastal Plan (LCP) Consistency

2. PRMD agrees with the DEIR's conclusion that the project is inconsistent with LCP Visual Resources Policy 2 that "prohibit[s] development that will significantly degrade the scenic qualities of major views and vista points." The project would degrade the scenic quality of two Major Views and one Vista Point identified on the LCP Open Space Map. The project is inconsistent with several other LCP policies, identified and discussed in comments 3 through 5, below.

LJ1-4

3. As stated in the DEIR, the LCP Access Plan identifies that Gleason Beach Subdivision Access is probably prescriptive and recommends prescriptive rights be proved. Specifically, Access Plan Policy 54 recommends this beach be acquired through prescriptive rights or purchase, a small parking lot be developed, and restrooms and a boardwalk wheelchair ramp be installed. The acquisition and development of this public access has a priority number 1, the highest priority for access projects. LCP Figure VII-8, Beach Parking Lots, identifies a proposed parking lot in this location. LCP Access Plan General Policies 2 through 8 fully support the acquisition and development of public access at this location. Therefore, the DEIR should evaluate how the project will include investigation of prescriptive rights, completion of the recommended acquisition, and development access to find the project consistent with the LCP Access Plan and policies referenced in this comment.

- LJ1-5 4. While public beach access is essential, the boardwalk and viewing platform are out of scale with the area. LCP Visual Resource Policies 9 and 10 require development to be designed and located to be compatible with the natural setting and existing community characteristics. Existing beach access improvements along the Sonoma Coast are typically less formal and more harmonious with the natural surroundings, consisting of trails and, where needed, stairs built into the earth. Visual Resources Policy 20(B)(1) provides specific direction for locating structures on cliffs and bluffs, and Access Plan Policy 54 specifically identifies a boardwalk wheelchair ramp to be developed at this site. Therefore, the DEIR should evaluate an alternate accessible boardwalk that is visually compatible with the surrounding area to find the project consistent with these LCP Access Plan and Visual Resources Policies.
- LJ1-6 5. Bridge width should be reduced to reduce visual impacts and match the existing conditions. The DEIR notes the existing alignment consists of 11-foot travel lanes and zero to 2-foot shoulders. The proposed travel lanes should be reduced to match existing widths in the project area. The LCP requires four-foot wide shoulders to serve as bike lanes on Highway 1 (see LCP Transportation Policies 28 and 29). Transportation Policy 31 requires four-foot shoulders on both travel lanes for two identified bridge replacement projects, Bridgehaven and Salmon Creek. Although the subject project is not specifically identified in the LCP, the intention to balance visual impacts with bicycle access on bridge projects is clear. Mitigation Measure VISUAL-1 should be amended to limit the bridge shoulders to four feet to further reduce visual impact, comply with Transportation Policy 28, and still provide adequate width for bicyclists. PRMD agrees with the conclusion that eight-foot paved shoulders will serve as on-street parking. If any non-bridge sections of the project will have eight-foot paved shoulders, they should be identified on the plans and recognized as beach access parking spaces.
- LJ1-7 6. The statement that the LCP visual resource policies are geared toward private development and not generally applicable to the project is incorrect (DEIR section 2.1.1.1, *Sonoma County Local Coastal Program*). Visual resource policies have consistently been applied to CalTrans projects within the coastal zone in Sonoma County. While many of these policies are aimed at buildings, the intent of the LCP is to apply these policies to minimize visual impacts from Highway 1 and other public roadway development projects. This statement should be amended to reflect the LCP's intent and implementation.
- Aesthetic/Visual Impacts**
- LJ1-8 7. The Coastal Visual Resources Map identifies the project area contains Above Average Views east of and Outstanding Views west of existing Highway 1. The Viewshed Composition Map identifies the project area contains coastal terraces to the east and cliffs/bluffs and beaches/dunes to the west of existing Highway 1. This information should be included in the DEIR discussion of aesthetic impacts and/or regional plans to provide additional regulatory context and background information.
- LJ1-9 8. The DEIR states the project will introduce an urban-industrial feature, the bridge, into a natural, rustic setting. The County agrees that the project will permanently alter the visual character of the project area and understands that relocation options are very limited. But sensitive, high quality design could change the character of the bridge to a less intrusive feature that better blends with the surrounding natural environment. What specific design elements will be incorporated into the bridge to reduce visual impacts to the maximum extent feasible? Colored concrete, stamped concrete, painted guardrails, etc. should be considered to reduce visual impacts. Mitigation Measure VISUAL-2 should be strengthened to ensure all available design and treatment options are utilized to reduce visual impacts.
- LJ1-10 9. The Draft Marin and Sonoma Highway 1 Repair Guidelines have consistently been applied to CalTrans projects in Sonoma County to ensure highway projects better blend with the existing natural setting. A mitigation measure should be included requiring the project to comply with these guidelines to further minimize significant impacts on scenic views and visual character of the project area.

- Farmlands/Timberlands**
- LJ1-11 10. How did CalTrans determine the land under a Land Conservation Contract will still be suitable for grazing after project construction? Were factors like percentage of land taken vs. land remaining, number of cattle, carrying capacity of land, etc. considered? While the conclusion is reasonable, the DEIR should include some analysis or explanation.
- LJ1-12 11. Section 2.1.3 should be amended to state the Williamson Act allows local governments to enter into recorded contracts, not private contracts, with landowners.
- LJ1-13 12. The Operation Phase refers to using fee acquisition and easements to acquire land for the project. Please explain.
- LJ1-14 13. The DEIR states, "The property under a Williamson Act contract would remain under contract." The County assumes that for the portion of land taken, the contract will be voided because acquisition will occur by eminent domain or in lieu of eminent domain, and the remainder of land after acquisition would remain under contract. This should be clarified in the DEIR. Be advised that the Department of Conservation must review CalTrans' land acquisition proposal prior to acquisition.
- LJ1-15 14. Government Code section 51292 requires certain findings be made when a public improvement is placed within an agricultural preserve, but section 51293 excuses those findings in certain circumstances. Explain why CalTrans is excused from making those findings. It seems the appropriate section that excuses the agency from making findings is section 51293(g), which pertains to State highways, including Highway 1.
- Water Quality**
- LJ1-16 15. The seed mixes and/or plants used for erosion control, biofiltration, and similar functions should be regionally native and appropriate for the project site. The Water Quality and Stormwater Runoff mitigation measures should be modified accordingly.
- California Coastal Trail**
- LJ1-17 16. The DEIR recognizes there is an existing gap in the Coastal Trail in the project area. The DEIR concludes this gap would be closed with the project because pedestrians and bicyclists would use the new section of Highway 1. This conclusion is erroneous. The existing highway is already used by pedestrians and bicyclists; the realigned section of Highway 1 would simply make it easier and safer for those users. The project does not include a new Coastal Trail alignment. Therefore, the project would not close the existing trail gap.
- LJ1-18 17. The LCP Recreation Chapter acknowledges that State Coastal Plan Policy 145 would establish a coastal trail system, and that lateral access could be incorporated into the trail system. The Access Plan shows a trail generally located between Highway 1 and the beach in the project area. The draft LCP includes seven new policies (C-PA-2a through C-PA-2g) addressing the Coastal Trail. Notably, these policies dictate the Coastal Trail should be located close to the ocean, not be located on roadways, utilize existing trails and facilities, and minimize environmental impact. Most importantly, draft LCP policy C-PA-2g requires construction of Coastal Trail segments with, "new or major replacement infrastructure, such as realignment of Highway 1."
- Given the existing LCP support for the trail and the draft LCP policies supporting and requiring trail construction, the project should include construction of the Coastal Trail within the project area. The DEIR should include a map and description of the existing, proposed, and future Coastal Trail alignments in and near the project area. Sonoma County Preliminary Draft LCP Figure C-PA-1h (Public Access: Pacific View/Willow Creek) should be used because it reflects

LJ1-18 (cont'd) | the most current information on the Coastal Trail alignment. This map identifies a future Coastal Trail alignment in the project area. It is shown generally along Highway 1 because the exact location has not yet been determined.

Biological Resources

LJ1-19 | 18. Impacts to Myrtle's silverspot butterfly habitat appear to be mitigated by enhancing nearby habitat and other methods. However, each of the project build alternatives moves the traveling public further into and bisects Myrtle's silverspot butterfly habitat. Compensatory mitigation is offered from the loss of grassland habitat at a 1:1 ratio, but no mitigation is offered to reduce the likely increased seasonal loss of alates moving across Highway 1. This could be rectified by increasing the mitigation ratio or additional avoidance measures, such as seasonally reducing speeds through the project area. In addition, the enhancement and compensatory mitigation should include a three to five year dynamic monitoring plan to ensure the local Myrtle's silverspot butterfly population remains stable.

LJ1-20 | 19. Impacts to sensitive aquatic organisms (California red-legged frog and salmonids) from the proposed project build alternatives should be partially mitigated on-site by enhancement of the local riparian habitat on Scotty Creek. A plan to restore the riparian zone within the proposed project area should include cattle exclusion, use of locally collected native plant source materials, and be designed by a qualified plant communities ecologist or landscape architect. Specifically, the plan should assess habitat improvements to all sensitive wildlife species, including tricolored blackbird, the listed anadromous salmonids, and California red-legged frog.

LJ1-21 | 20. This project presents an excellent opportunity to restore Scotty Creek. The property owners of Ballard Ranch (APN 101-110-005) have indicated they are willing and excited for creek restoration on their property. CalTrans should do everything in its power to incorporate creek restoration into the project.

LJ1-22 | 21. Why are two new access roads proposed to serve the existing houses on Gleason Beach? Only one access road should be created to minimize impact to coastal terrace prairie and related biological resources. Eliminating one access road would also reduce visual impacts.

Cultural Resources

LJ1-23 | 22. PRMD concurs that the project will have a significant adverse impact on the visual setting of the historic coastal dairy ranch (County Landmark #119, Gleason-Mann-Ballard Ranch). The site is a locally designated, historically significant property and is located in the HD (Historic District) Combining Zone. The size and location of the bridge structure results in a massive new man-made feature in a very rural, scenic, and historic context. To reduce impact to the historic coastal dairy ranch, the alternatives analysis should include and discuss the feasibility of an alignment that is:

- a. located farther away from the cluster of ranch buildings;
- b. not elevated as much or as high above grade; and
- c. narrower in width.

LJ1-24 | 23. Mitigation measure CUL-5 requires interpretive signage pertaining to historic coastal dairy ranches. PRMD will require the signage be included with the Coastal Development Permit application so County staff, the County Landmarks Commission, and the public have an opportunity to review it. Mitigation measure CUL-5 should be amended to include this requirement.

LJ1-25 | 24. The DEIR should note that the two Sea Ranch style houses will likely be demolished by storm events or property owners in the near future due to ongoing bluff erosion under the No Build and Build Alternatives. It would be helpful to include the average bluff erosion rate to provide context for the reader. This section should reiterate that all previous efforts to preserve structures on the bluff have failed.

LJ1-26 | **Procedural**
25. PRMD will process the Coastal Development Permit for the portion of the project within its jurisdiction. The County's decision on this permit will be appealable to the Coastal Commission.

LJ1-27 | 26. PRMD would appreciate being able to review and comment on the Administrative Draft of the Final EIR.

Corrections/Typos

LJ1-28 | 27. The following errors should be corrected:
a. Section 2.1.1.1, page 2-15, states that the project complies with local plans, then states it does not comply with the LCP. This section should be amended to note the project does not comply with all local plans.
b. Sections 2.1.1.1 and 2.1.3 incorrectly identify the General Plan land use designations as General Industrial and Rural Residential west of Highway 1; the correct designations are Public-Quasi Public and Rural Residential. Section 2.1.1.1 incorrectly identifies the project area as located in the Sea Ranch South map; the correct map is Pacific View/Willow Creek.
c. The boundaries of Sereno Del Mar and Carmet subdivisions are incorrectly identified on Figure 2-1.
d. On Figure 2-2, APN 101-130-013 is incorrectly identified as under a Williamson Act contract.
e. Sonoma County General Plan and Zoning designation LEA stands for Land Extensive Agriculture.
f. The California Coastal Trail is sometimes identified as the California Coastal Train.
g. It would help the reader to consistently refer to the bridge as "bridge" and not "viaduct."

Please contact me at Misti.Harris@sonoma-county.org or 707-565-1352 if you have any questions. Thank you again for the opportunity to comment. We appreciate CalTrans' commitment to local, high quality public outreach and look forward to continuing to work with you on this project.

Sincerely,



Misti Harris
Planner III

c: Efren Carrillo, 5th District Supervisor
Tennis Wick, AICP, Director
Jennifer Barrett, Deputy Director
Dean Parsons, Project Review Manager
Sandi Potter, Environmental Review and Comprehensive Planning
File

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Response to Comment Letter LJ1: Sonoma County Permit and Resource Management Department

Response LJ1-1	Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Your comments are addressed below.
Response LJ1-2	As part of the identification of the Preferred Build Alternative, Caltrans has evaluated the public comments on the Draft EIR/EA, as well as the environmental impacts associated with each Build Alternative. Alternative 19A was identified as a result of this process. Caltrans recognizes the scenic qualities of the Gleason Beach area and the Final EIR/EA with FONSI seeks to balance the project objectives versus the scenic and historic character of the project area. In reference to the location of the proposed boardwalk, it is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location option for the project to provide beach access. Caltrans has been receptive to input on the public access features included in the project and conducted a community meeting in April 2016 to provide further input on the preliminary design of the proposed SR 1 roadway realignment. Caltrans will continue to explore further design refinements during the permitting stage of the project.
Response LJ1-3	Caltrans recognizes and disclosed that all three proposed alternatives would be inconsistent with the adopted 2001 LCP. Caltrans will address the LCP consistency in the CDP application.
Response LJ1-4	Caltrans will address the LCP policies identified in the draft LCP Update dated July 2015 in coordination with Sonoma County during the CDP application. Parcel acquisitions will be determined in coordination with landowners and as part of the permitting phase of the project.
Response LJ1-5	The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location for the project to provide beach access. South of Scotty Creek, there are no public parcels and so beach access cannot be proposed at these locations. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. This feature will be further refined during the CDP process.
Response LJ1-6	<p>Due to safety considerations and the non-linear alignment of the roadway, 11-foot travel lanes and 0- to 2-foot shoulders are not feasible. Since the circulation of the Draft EIR/EA the dimensions of the roadway and bridge have been modified from what was described in the Draft EIR/EA to balance pedestrian, bicyclist and motorist safety.</p> <p>Shoulder widths on non-bridge portions of the new SR 1 alignment would be 4 feet of paved surface and 4 feet of unpaved surface. On the bridge, a wider shoulder is warranted as the bridge rail would be a vertical element that would block users' ability to see the road ahead on curves. A wider shoulder would allow for increased sight distance. In addition, a wider shoulder would increase safety on the bridge compared to existing conditions as there are currently no emergency escape areas for bicycles, pedestrians and vehicles on the existing bridge over Scotty Creek.</p> <p>Based on Caltrans design standards, due to the horizontal curves at each end of the proposed bridge, a 15-foot to 16-foot shoulder is required at the southern end and a 10-foot shoulder is required at the northern end. In order to minimize the project's footprint, efforts were made to minimize these shoulder widths. The Draft EIR/EA proposed 8-foot shoulders on the bridge. These have now been further reduced to as little as 6 feet at certain locations on the bridge, resulting in a decrease of 2 feet compared to the shoulder width identified in the Draft EIR/EA.</p> <p>Pedestrian and bicycle access would be accommodated on the new SR 1 alignment. Since the circulation of the Draft EIR/EA, the dimensions of the elevated bridge have been modified from what was described in the Draft EIR/EA to more safely accommodate multimodal transit. The updated proposed bridge is planned to be 49 feet wide with a 6- to 8-foot shoulder and 6-foot sidewalk in the southbound direction and a 6- to 8-foot shoulder in the northbound direction. These shoulder dimensions would be wider than shoulders along existing SR 1 and would better allow for multimodal use of the project corridor compared to existing conditions.</p> <p>Since the circulation of the Draft EIR/EA, construction of a pedestrian and bicycle bridge over Scotty Creek in the location of the existing culverts/bridge to be removed from Scotty Creek is now under consideration, if determined to be feasible.</p>
Response LJ1-7	Since the circulation of the Draft EIR/EA, Section 2.1.1.1, Land Use, has been revised to note that LCP policies related to scenic and visual qualities have been considered in the project design.

Response LJ1-8	<p>Since the circulation of the Draft EIR/EA, the existing setting information presented in Section 2.1.6, Visual/Aesthetics, of the Draft EIR/EA is augmented in the Final EIR/EA with FONSI by the following information:</p> <p>“County of Sonoma Local Coastal Plan: The County of Sonoma LCP identifies the project area as having Above Average Views east of SR 1 and Outstanding Views west of SR 1.”</p>
Response LJ1-9	<p>One of the goals of the bridge design is to make the structure as visually thin, light and streamlined as possible, with a curving alignment that blends into the local geography. The project also calls for the development of such design refinements during the project design phase, and it is Caltrans’ intent to design the proposed bridge to be compatible with the landscape as much as possible (see Mitigation Measure VISUAL-2: Bridge Design Enhancement Measures). The bridge design will be further refined in the design phase of the project.</p>
Response LJ1-10	<p>Although the Marin Highway 1 Repair Guidelines have been in effect since 2015, the Sonoma Highway 1 Repair Guidelines are currently under development. These guidelines apply to minor storm damage repair projects and are not intended for use on replacement projects such as this proposed project. Caltrans recognizes the scenic and rural character of the project area and is designing project features that are as compatible as possible with the landscape while also meeting the purpose and need of the project.</p>
Response LJ1-11	<p>Measures such as cattle crossings can be provided to allow contiguous access for cattle to continue to use parcels unless the parcels will be taken out of grazing use altogether. These details will be finalized during the right-of-way phase of the project.</p>
Response LJ1-12	<p>Since the circulation of the Draft EIR/EA, Section 2.1.3, Farmlands/Timberlands related to the Williamson Act has been revised as follows: “The Williamson Act allows local governments to enter into recorded contracts with landowners.”</p>
Response LJ1-13	<p>The proposed project’s right-of-way requirements are summarized in Table 2-7, Preliminary Right-of-Way Requirements. The table describes the various temporary and permanent easements required for project implementation.</p>
Response LJ1-14	<p>Upon completion of the environmental review phase of the project, Caltrans’ Right-of-Way personnel would begin the process of securing the land that is necessary to implement the project. This would involve negotiations with applicable landowners to acquire property and/or secure easements.</p>
Response LJ1-15	<p>Since the circulation of the Draft EIR/EA, Section 2.1.4.3, Affected Environment, has been modified to state that the appropriate section that excuses Caltrans from making findings when a public improvement is placed within an agricultural preserve is Section 51293(g), which pertains to state highways, including SR 1.</p>
Response LJ1-16	<p>Since the circulation of the Draft EIR/EA, Measure WATER-7: Treatment Measures has been modified as follows: “Seed mixes and/or plants used for erosion control, biofiltration, and similar functions would be regionally native and appropriate for the project site.”</p>
Response LJ1-17	<p>Since the circulation of the Draft EIR/EA, Section 1.3, Project Description, has been modified to recognize that there is not an existing gap in the CCT in the project area. This statement has been modified in this section and in any other parts of the Final EIR/EA with FONSI where it is mentioned, with the following: “The California Coastal Trail (CCT) is coincident with existing SR 1 throughout the project limits. The CCT is a network of public trails for walkers, bicyclists, and others along the 1,200-mile coastline. Near Gleason Beach, pedestrians and bicyclists share the roadway with vehicles or use the shoulders. Project implementation would provide enhanced recreational access, given that the new SR 1 would feature widened shoulders, and a sidewalk on the new bridge, to accommodate pedestrians and bicyclists traveling through the proposed project area. Caltrans would also construct a pedestrian and bicycle bridge over Scotty Creek, if feasible, that would connect the northern and southern remnants of SR 1 following removal of the box culverts.”</p>
Response LJ1-18	<p>Caltrans supports efforts to enhance public access and has worked closely with related agencies and the public to include pedestrian and bicycle access on the new SR 1 alignment, as well as a pedestrian and bicycle bridge over Scotty Creek, if feasible. The existing CCT alignment can continue to be used for pedestrian and bicycle access along the coast depending upon future bluff retreat and coastal erosion. Project consistency with the Recreation policies in the adopted 2001 LCP and draft LCP dated July 2015 will be addressed in the CDP application.</p>
Response LJ1-19	<p>Avoidance, minimization, and/or mitigation measures have been refined to reflect the USFWS Biological Opinion (USFWS 2016b). Mitigation details will be further refined during Section 7 consultation with USFWS.</p>

Response LJ1-20	The project will largely avoid impacts to sensitive aquatic organisms through construction of a bridge which spans Scotty Creek and limited water diversion/in-water work designed to minimize potential conflicts with salmonids. Riparian restoration and grazing management will be determined in coordination with landowners and as part of the permitting phase of the project. Avoidance, minimization, and/or mitigation measures have been refined to reflect the USFWS Biological Opinion (USFWS 2016b).
Response LJ1-21	Caltrans recognizes the potential value in improving Scotty Creek and will continue to explore restoration of Scotty Creek in the permitting phase of the project development. Currently, the proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. In addition, although not a mitigation requirement commensurate with impacts to this project, Caltrans will be coordinating with resource agencies as part of the permitting phase of the project to review opportunities for improving conditions within Scotty Creek and its associated riparian corridor.
Response LJ1-22	The Draft EIR/EA Section 1.3, Project Description, identified three access roads to provide access to the remaining property owners and the coast. Three separate roads are needed because the following three barriers will be created as a result of the proposed project: 1) the Scotty Creek culverts and roadway would be removed; 2) the section of SR 1 by the soldier pile wall is expected to erode away in the near future, and a contingency measure for that failure should be considered; and 3) the northern section of the existing alignment does not connect to the realigned SR 1 to the north because the resulting small angle formed at the intersection creates safety concerns as it would be difficult for vehicles to see approaching vehicles/bikes while turning from the existing alignment.
Response LJ1-23	<p>Three project alternatives were carried forward for further evaluation in the Draft EIR/EA. None of these alternatives could avoid impacts to the Gleason-Mann-Ballard Ranch. Design of the three alignments was a balancing act to avoid architectural, archaeological, biological, visual, and other sensitive resources, as well as meet highway safety and sight distance curvature requirements.</p> <p>Since 2007, Caltrans design engineers and environmental specialists have continually refined the proposed project in an effort to avoid or reduce impacts as much as possible to many different environmental resources. In total, Caltrans has evaluated over 20 project design alternatives/variations as part of the project identification process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still meeting the project purpose and complying with Caltrans design standards and constraints.</p> <p>As a result of further environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative because it best avoids or minimizes impacts to all sensitive resources in the project area.</p>
Response LJ1-24	As described in Mitigation Measure CUL-5: CEQA-Specific Mitigation – Interpretive Signage and Materials, Caltrans is committed to working with stakeholders and further details will be addressed during the design phase of the project.
Response LJ1-25	Although both of the Sea Ranch style houses are within the architectural history APE, demolition of these two buildings is not part of the project scope, nor can Caltrans predict when and if they will be removed. Information regarding the bluff erosion rate and the consistent failure of past stabilization efforts is provided in Section 1.1.2 and also under the "Adaptation Strategies for Sea Level Rise" section of Chapter 3.
Response LJ1-26	Caltrans will continue to coordinate with Sonoma County to determine the appropriate CDP review process.
Response LJ1-27	The Draft EIR/EA was distributed to the public and to public agencies. The comment period ended on August 23, 2015. Caltrans will continue to coordinate with the public agencies, as related to completion of the Final EIR/EA with FONSI and permitting, but will not recirculate the Final EIR/EA with FONSI for additional public comment.
Response LJ1-28	Caltrans has corrected the errors noted in the comment.

LC1-1

COMMENTS

Please send me a copy of:
VISUAL IMPACT ASSESSMENT
0400000129 and EA 0A0200
JAN. 2015 (hardcopy)

Thank you.
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 **GLEASON BEACH ROADWAY REALIGNMENT**
Roadway Realignment and Coastal Access in Sonoma County
04-Son 1 (PM 15.1/15.7) EA# 04-0A0200

Comments must be received on August 23, 2015 by 5pm
Email: gleasonrealignment@dot.ca.gov
www.dot.ca.gov/dist4/envdocs.htm

August 22, 2015

Mr. Oliver Iberien, Branch Chief
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California Department of Transportation Dist. 4
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Re: Caltrans' failure to comply with CEQA by not holding a public hearing on the Draft EIR/EA for the proposed Gleason Beach Roadway Realignment Project; Failure to adequately circulate Visual Impacts Study document for public comment in timely fashion; General comments on Draft EIR/EA on the proposed Gleason Beach Roadway Realignment Project.

Dear Mr. Iberian:

These comments on the proposed Gleason Beach Roadway Realignment Project Draft EIR/EA are intended to document Caltrans' failure to comply with the California Environmental Quality Act (CEQA) by not holding any public hearings on the Draft EIR/EA, to verify Caltrans' failure to circulate in timely fashion the Visual Impacts Study document in order to allow adequate public review before the comment deadline, and to provide general comments on inadequacies in the Draft EIR/EA.

LC1-2

Although the July 29, 2015 Bodega Bay meeting advertised as an "Open House Public Question/Answer Panel for the Draft Environmental Impact Report/Environmental Assessment for the Gleason Beach Roadway Realignment Project" was promoted by Caltrans in their outreach mailer as being held "to solicit comments and questions on the environmental analysis and impacts evaluated in the Draft Environmental Impact Report/Environmental Assessment (EIR/EA) prepared for Caltrans proposed project to realign State Route 1 at Gleason Beach in Sonoma County", this meeting instead began with an announcement by the Caltrans representatives present stating that "no record will be made of this meeting". This belated announcement by Caltrans to a room full of interested local citizens, most of whom had turned out in anticipation of being able to speak on the record for this Project, obviously had a dampening effect on the number and content of any oral presentations by the public and precluded public comment from being documented.

Local Coastal Plan Amendment Required:

LC1-3

The proposed Gleason Beach Roadway Realignment Project (Proposed Project) will clearly require an amendment to the Sonoma County Local Coastal Plan. For this and other reasons, a full public hearing on the Draft Environmental Impact Report/Environmental Assessment for the Proposed Project, to comply with CEQA, will be essential. We hereby request that Caltrans hold one or more public hearings in which a written record of the proceedings is formally collected.

Failure to Mitigate Project's Significant Adverse Impacts on Visual Character of the Sonoma Coast:

LC1-4

Virtually every one of the Proposed Project Alternatives that remain under consideration by Caltrans for the proposed Gleason Beach Roadway Realignment Project, except for the "No Project" alternative, will result in major adverse impacts to the County of Sonoma Designated Scenic Resource Area SubArea 8/Pacific View/Willow Creek map segment shown in Figure C-OSRC-1h of the Sonoma County Local Coastal Plan.

LC1-5

Although Caltrans commissioned a separate document called the "Visual Impacts Study", Caltrans' failure to circulate and solicit comments on this Visual Impacts Study, and the agency's failure to make this document readily available to the public in timely fashion, contribute to a flawed disclosure of the impacts of the Proposed Project to the delicate ecosystem and visual ambience of the Scotty Creek watershed, a favorite attraction with visitors to the Sonoma Coast often found in tourism guides. Formal requests to Caltrans' staff and consultants at the July 29, 2015 meeting held at the Bodega Bay Grange Hall were met with statements by the consultants to the effect that hardcopies or CD-ROMs of the Visual Impacts Study are not available, that the Visual Impacts Study is not accessible online, and that any member of the public with an interest in this document would need to fill out a specific written request for a copy of it on one of the Caltrans "Comments" cards provided at the meeting. Duly completing such a request in writing, providing a mailing address, and handing the request card in person to the designated Caltrans staff at the meeting, did not result in the availability of an emailed .pdf file of the Visual Impacts Study from Caltrans consultants CH2M Hill for public review until August 19, 2015, nearly the close of comments on the Proposed Project.

LC1-6

Section 30251, Scenic and Visual Qualities of the California Coastal Act, states that "(T)he 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."

The loss to the public of the picturesque Scotty Creek scenic landscape unit beneath an industrial-scale concrete bridge more appropriate to an urban cityscape freeway overpass does not comply with the abovementioned provision of the California Coastal Act and should not be taken lightly by Project planners. A more graceful structure should be designed, at a lower and less-intrusive elevation, and a more visually-transparent highway railing design should be incorporated in any final design.

LC1-7

The scale of the Proposed Project in the context of this sensitive site and setting is, quite simply, engineering overkill. To introduce such a substantial level of diverse adverse impacts in this unique environment absent a full public hearing process, absent an unbiased reconsideration of earlier less-impactful options not fully evaluated, and absent a redesign of the Proposed Project to minimize and mitigate the full range of anticipated impacts is not compliant with the California Coastal Act and with CEQA and CEQA guidelines.

LC1-8

Project Not About Adaptation to Sea Level Rise:

Many of Caltrans' underlying rationalizations on which the agency bases its' claimed need for this Proposed Project are predicated on fallacies about climate-based sea level rise. First, the false

LC1-8 (cont'd) justification that sea level rise is responsible for the rapid decomposition of cliff geology in this area has been convincingly debunked by both Caltrans' consultants and by longterm local residents. Clearly, a very narrow cliffside agricultural property was unwisely allowed to be subdivided for homes years ago, contrary to compelling evidence at the time the subdivision was approved that the geologically-unstable residential lots thus created could be expected to quickly erode due to the rapid flow of a perched water table that exits the cliff face part of the way between the elevation of the highway and the present mean high tide sea level. It is primarily the flow of water from these springs on the cliffside, combined with surface runoff, that provides the major contribution to cliff erosion now threatening adjacent homes and limited linear segments of the highway itself. The Proposed Project as designed, therefore, cannot logically be characterized as necessary due to sea level rise. The draft EIR/EA, in addition, makes no mention of the probable contribution of new stormwater runoff from the extensive additional impervious surfaces of, and drainage from, the Proposed Project, which are expected to be added to the present runoff from existing highway surfaces in this region.

LC1-9 The total north/south extent of the Proposed Project (between 3000 feet and 3700 feet) clearly has become much longer than would otherwise have been necessary, due in large part to the neighborhood septic leach field that was allowed to be constructed on the east side of Highway One. An additional alternative in Caltrans' Proposed Project EIR/EA should be proposed and fully evaluated that would enable a shorter and less invasive bypass route that could result from relocating this interim leach field, particularly since this leach field now serves a much smaller number of remaining houses due to the subsequent removal of some of the destabilized residences it was installed to serve.

Amplified Traffic Hazards from Increased Highway Speeds Associated with the Proposed Project:

LC1-10 Traffic hazards associated with the minimal straight sections of Highway One along the Sonoma Coast focus on hurried and anxious drivers who commonly disregard, and cross over, double yellow line striping in order to try to overtake slower drivers by unsafe passing. The slope gradient of the proposed large bridge, its width, and the straightened lines-of-sight will inevitably embolden drivers to speed up and attempt to pass on the elevated bridge associated with the Proposed Project, as now commonly occurs on similar straight sections of Highway One elsewhere along the Sonoma County Coast, even where no-passing zones are in clear evidence. The Draft EIR/EA also fails to address the physical reconfiguration of this section of highway and its implications for accelerated speeds in areas of existing Highway One located to the north and south of the Proposed Project.

Protecting Domestic Water Sources and Sensitive Wetlands:

LC1-11 The draft EIR/EA for the Proposed Project fails to delineate how Caltrans' scenarios for planning the proposed construction will protect existing domestic and agricultural water sources in this seasonally water-short valley. Some of the residential users now dependent on fragile developed wells and springs have no other alternative source of water supply. The excuse, oft-repeated by Caltrans, that "these issues will be resolved later in the process" does not adequately mitigate this and related hydrologic problems.

LC1-12 Sensitive wetlands, which provide critical habitat for unique species and that are subject to the provisions of the federal Clean Water Act, are not addressed adequately in the EIR/EA for the Proposed Project, and prior efforts by affected landowners to pursue restoration of salmonid habitat in Scotty Creek appear to have fallen by the wayside. Gleason Beach and the surrounding wetlands area upstream clearly comprise what the Sonoma County Local Coastal Program (LCP) refers to as

LC1-12 (cont'd) Environmentally-Sensitive-Habitat (ESHA) as defined by the California Coastal Commission (CCC). The Proposed Project will impose permanent adverse impacts to the Coastal Prairie ESHA at this location. The wetlands that would be impacted by the proposed realignment project at Gleason’s Beach represent some of the only remaining native habitat in that category on the Sonoma Coast, thus the requisite Corps of Engineers wetland permitting protocols involving full compliance with the federal Clean Water Act (CWA) should be observed by Caltrans. The remaining historic ranch house has been well maintained and the associated agricultural accoutrements along Scotty Creek represent a culturally important landmark on the Sonoma Coast, one which should not be casually sacrificed to simply disappearing below an overbuilt bridge project. The loss of this agricultural heritage site would then hypothetically be “mitigated” by a future Caltrans brochure as has been proposed by the Agency. This is inadequate mitigation for such a significant loss.

LC1-13 Likewise, tentative mitigations discussed by Caltrans for permanent loss of the Myrtle’s Silverspot butterfly habitat (of which only four populations are known to remain in California) and for damage by the Proposed Project to the California red-legged frog and its habitats are inadequate and need to be more fully delineated in the FEIR.

Public Safety Hazards Associated with Vestigial Sections of Old Highway One Remaining After the Project:

LC1-14 The draft EIR/EA does not suggest how Caltrans and local residents are expected to cope with the “attractive nuisance” configuration of the proposed off-highway parking and other appurtenances that would be incidentally created as an indirect result of the Proposed Project’s abandonment of sections of the old highway alignment. The two dead-end road “spurs” that would be left remaining that will then terminate at the north and south banks of Scotty Creek after the existing Highway One culvert is demolished can reasonably be anticipated to become a haven for late-night mischief by members of the public seeking a place to congregate, party, or discharge firearms. A review of reported law enforcement incidents at night along the unincorporated parts of the Sonoma Coast between The Jenner Grade and Bodega Bay between 1980 and the present will confirm this concern. In spite of the best efforts of responsible authorities in the face of limited budgets, inadequate patrols at night by state park personnel or county law enforcement inevitably leave any parking area, abandoned roadway, or beach that is vehicle-accessible and not visible directly from Highway One vulnerable as an attractive nuisance. The proposed Caltrans construction of a small parking lot for several automobiles at Scotty Creek only exacerbates this problem unless said parking lot is gated and managed so as to be securely closed to public access at night.

LC1-15 During the day, in the summer, an excessive number of inbound vehicles attempting to enter the much-larger upper parking lot at Goat Rock Beach find themselves backed up from entering by earlier-arriving drivers trying to exit on the same narrow roadway after finding the parking lot there full to capacity. At nearby Duncans Landing, a unit of the Sonoma Coast State Park, the closure of longstanding park restrooms due to budget constraints has resulted in public use of the beach area itself as a restroom, and subsequent removal of park trash receptacles to save the cost of refuse pickup has left visitors with no disposal options for garbage or pet waste in recent years.

Proposed Stairs Limiting Public Access to Gleason Beach:

LC1-16 The Proposed Project proposes to construct a boardwalk to provide public access to the beach just north of Scotty Creek. This boardwalk, as designed, would not be wheelchair accessible, which the EIR/EA claims is due to the steep slope and the necessity for a constrained footprint resulting from water levels, sensitive habitat, and private property impact concerns. This access point is being

LC1-16 (cont'd) | proposed for passive recreational uses associated with beaches (e.g., walking, sunbathing, picnicking, and nature study), but the EIR/EA fails to explain how this diminished level of access mitigates for the loss of the present pre-existing level of access. No ADA considerations are in evidence in the plans for this proposed stairway structure.

Noncompliant Section 4(f) De Minimis Determination for the Project:

LC1-17 | A flawed Section 4(f) Evaluation document has been prepared in tandem with the Gleason Beach State Route (SR) 1 Roadway Realignment Project Draft Environmental Document (DED). This document purports to provide, but fails to submit, documentation necessary to support determinations required to comply with the provision of 23 United States Code (U.S.C.) 138 and 49 U.S.C. 303, commonly referred to as Section 4(f).

The environmental review, consultation, and any other action required in accordance with applicable federal laws for this project is claimed to have been carried out by Caltrans under its assumption of responsibility pursuant to 23 U.S.C. 327. This documentation has not been prepared in accordance with legislation established under the United States Department of Transportation Act of 1966 (49 U.S.C. 303; 23 U.S.C. 138).

Inadequate Cultural Resources Identification Efforts for the Proposed Project:

LC1-18 | Cultural resource studies within the Project Area are claimed by Caltrans to have included completion of an archaeological inventory (Caltrans 2012d), an inventory of the built-environment (Caltrans 2012e), and a subsurface testing/NRHP eligibility study (Caltrans 2014h). These documents were not adequately circulated for public review, and even though 2012d was likely not circulated in order to better protect archeological sites from illegal pothunters and vandals, some degree of appropriate professional peer-review should have been conducted. Caltrans also claims to have prepared a summary document providing an overview of methods and findings regarding cultural resources for this project (Caltrans 2014e). A draft report, "Historic Resources Inventory and Evaluation Report, Scotty Creek Restoration, Gold Ridge Resource Conservation District Sonoma County California," was apparently prepared by JRP Historical Consulting in April 2011, and was supposed to have included the initial NRHP evaluation of the Gleason-Mann-Ballard Ranch that was used in the inventory of built environment resources for this Proposed Project. No final version of this report has been made available to the public. This document and the protocols for this research have not been circulated for public review.

LC1-19 | A records search was purportedly conducted on October 19, 2009, at the Northwest Information Center of the California Historical Resources Information System (File #09 0473), housed at Sonoma State University, Rohnert Park. The records search is claimed to have included a review of all known cultural resources records and reports within 0.5 mile of the Project Area, and although the Scotty Creek area was obviously a place of reverence and habitation for native peoples, not all of these uses are necessarily documented within the Northwest Information Center of the California Historical Resources Information System database. Even though results of the records search indicated that some site-specific archaeological studies have been conducted in the Proposed Project area, the Draft EIR/EA for the Proposed Project fails to verify the document's claim of an adequate and representative inventory. In light of the nature of the sheltered valley along Scotty Creek, it seems improbable that only 4-5 archeological properties were located there, as claimed by Caltrans. There were likely a greater number of sites along Scotty Creek than those documented thus far.

LC1-20 | Although Caltrans asserts, in the Draft EIR/EA, that a reasonable and good faith effort has been

LC1-20 (cont'd) | made to identify any members of the local Native American community who may attach religious or cultural significance to the Proposed Project area, more onsite research should be done now that the preferred alternative routes have been more narrowly identified.

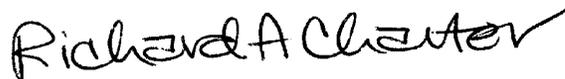
Conclusions:

LC1-21 | Unfortunately, the scale of the proposed 750-900 foot elevated concrete bridge, bypass approaches, and abutments and engineered concrete supports currently being contemplated by Caltrans would appear to be a case of serious institutional overkill. Unless this set of problems are approached with more sensitivity to the unique values of the site in question, Caltrans' Proposed Project could unintentionally destroy an important vestige of Sonoma County's agricultural and cultural history, obscure spectacular coastal viewsheds, unnecessarily complicate an important beach access point not presently requiring transit of a cliff face trail, and irrevocably wipe out ecological and habitat values of significance to the State of California and the public.

LC1-22 | It is clear that whatever decision Caltrans may make about how best the Agency should proceed with any type of repair or realignment project at Gleason's Beach will need to be fully informed and guided by the environmental sensitivity, historical significance, archeological resources, riparian setting, wildlife values, and other unique site-specific factors that pertain to this particular location. The Draft EIR/EA, unfortunately fails to accomplish this balancing act.

LC1-23 | We are pleased to provide these written comments on the Proposed Project, but written comments are no legal substitute for timely public hearings, thus we look forward to a public hearing pursuant to CEQA, as delineated above.

Sincerely,



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email: waterway@monitor.net

cc:
Congressman Jared Huffman
Senator Barbara Boxer
Sonoma County Supervisor Efren Carrillo

Response to Comment Letter LC1: The Ocean Foundation

Response LC1-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Your comments are addressed below. A copy the Visual Impact Assessment was provided to the commenter via email on August 18, 2015.</p>
Response LC1-2	<p>In accordance with CEQA Guidelines Section 15802 and NEPA (42 USC 4321), a project scoping meeting was held in Sonoma County within the county of the proposed project in 2014. A public open house was held on July 29, 2015 to provide the public an opportunity to obtain information about the project, review project details, ask questions of Caltrans staff, and provide written comments on the Draft EIR/EA. The meeting was announced in the Notice of Availability (NOA) that was mailed to the State Clearinghouse on July 10, 2015. The NOA was published in the Santa Rosa Press Democrat newspaper.</p> <p>An announcement was made at that meeting that only written comments, such as on comment cards provided at the meeting, via email, or via regular mail, would be recorded and responded to. As required under CEQA, Caltrans collected all comments received via those written mediums and has provided written responses to them in the Final EIR/EA with FONSI document.</p> <p>The Visual Impact Assessment is a technical report used as the basis for the visual resources analysis presented in the Draft EIR/EA. As such, public circulation of the Visual Impact Assessment is not required under CEQA/NEPA. However, that report and other technical reports prepared for the Draft EIR/EA were made available to the public upon request at Caltrans' Oakland office. Given that the commenter could not visit the Caltrans office in person, a digital copy was made available by email on August 18, 2015.</p>
Response LC1-3	<p>The July 29, 2015 public open house provided the public an opportunity to provide written comments on the Draft EIR/EA. As required under CEQA, Caltrans collected all comments received via those written mediums and has provided written responses to them in the Final EIR/EA with FONSI document. Caltrans is committed to outreach to inform the public of its plans and an informational meeting was conducted in April 2016 to provide the community with an update of the project's plans and preliminary roadway and bridge design. A hearing will likely be held as part of the Coastal Development Permit and/or Local Coastal Plan amendment review as deemed necessary by the reviewing agency.</p>
Response LC1-4	<p>The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual resources within the project area. Various environmental considerations, including visual resources impacts, were evaluated in order to achieve a balance between multiple environmental resources. As a result of environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative that best balances potential impacts to multiple environmental resources.</p>
Response LC1-5	<p>The Visual Impact Assessment is a technical report used as the basis for the visual resources analysis presented in the Draft EIR/EA. As such, public circulation of the Visual Impact Assessment is not required under CEQA/NEPA. However, that report and all other final technical reports prepared for the Draft EIR/EA are made available to the public. A digital copy was made available to the commenter by email on August 18, 2015.</p>
Response LC1-6	<p>One of the goals of the bridge design is to make the structure as visually thin, light and streamlined as possible, with a curving alignment that blends into the local geography. Design modifications and enhancements such as those proposed by the commenter are called for in Mitigation Measure VISUAL-2: Bridge Design Enhancement Measures, and it is the intent of that measure to facilitate the development of such enhancements during the project design phase. It is Caltrans' intent to design the proposed bridge to be compatible with the landscape as much as possible.</p>

Response LC1-7	<p>The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual resources within the project area. As the project design moves forward for Preferred Build Alternative 19A, efforts will be made to address concerns related to the size and design of the proposed structure.</p> <p>In addition to constraints associated with visual quality, other environmental constraints related to the project design included the need to: 1) avoid the projected year 2100 erosion line along the coastal bluffs; 2) minimize impacts to the Scotty Creek floodplain; 3) continue to provide access to existing property owners; and 4) avoid floodplain areas where future storms could inundate the roadway, and ensure that the bridge soffit elevation is sufficient to keep the bridge deck above water during such storms. Over 20 project design alternatives/variations were evaluated as part of the project identification process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still complying with Caltrans design standards and constraints.</p>
Response LC1-8	<p>The Draft EIR/EA does not state that sea level rise is the primary cause of bluff erosion (see Section 3.2.6, Climate Change). The analysis of the bluff retreat included other contributing factors in addition to wave action, such as groundwater and earthquakes. In addition, the project design would avoid the projected year 2100 erosion line along the coastal bluff. The bluff retreat analysis also incorporated an increase in the wave action component due to future sea level rise.</p>
Response LC1-9	<p>One of the goals of the project design is to avoid the projected year 2100 erosion line along the coastal bluff. This constraint requires placement of the proposed SR 1 alignment further inland, preventing a shorter bypass route through the leach field. The leach field falls within the 2100 coastal erosion line and thus the realigned roadway cannot be built over it.</p>
Response LC1-10	<p>Vehicles speeding and passing illegally is a concern for the entirety of SR 1 and cannot be addressed by the proposed project alone. On the proposed new SR 1 bridge, the horizontal and vertical curvature of the roadway is designed for a maximum design speed of 50 miles per hour (mph), with the bridge and southern portion of the alignment designed for a speed of 40 mph. This curvature would help reduce overall travel speeds on the bridge, but ultimately cannot completely prevent high speed driving. However, as the project's design is further refined, traffic calming techniques such as the installation of bumps, warning signage, flashers and/or striping can be explored in order to reduce travel speeds.</p>
Response LC1-11	<p>As part of the environmental review process, Caltrans evaluated the project's potential impacts to water resources in the project area. In part due to potential impacts to water wells under Alternative 20, that alternative was eliminated from further consideration in order to avoid those impacts. Moving forward, these wells will be protected from project activities by ensuring that the project design avoids them.</p>
Response LC1-12	<p>The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids. The proposed project has been designed to avoid impacts to wetlands as much as possible by designing an elevated structure over much of the wetland area. Caltrans is working to minimize project-related impacts to sensitive environmental resources. Avoidance, minimization, and/or mitigation measures will be further refined in the permitting stage of the project. Caltrans will comply with the Clean Water Act and other relevant environmental permits.</p> <p>Three project alternatives were carried forward for further evaluation in the Draft EIR/EA. None of these alternatives could avoid impacts to the Gleason-Mann-Ballard Ranch. Design of the three alignments was a balancing act to avoid architectural, archaeological, biological, visual, and other sensitive resources, as well as meet highway safety and sight distance curvature requirements. As a result of environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative because it best avoids or minimizes impacts to sensitive resources in the project area.</p> <p>The Gleason-Mann-Ballard Ranch house and other buildings would remain after project construction, although a portion of the ranch's open land would be acquired for the proposed project. As indicated by Mitigation Measure CUL-5: CEQA-Specific Mitigation –Interpretive Signage in the Draft EIR/EA, documentation or recordation of the Gleason-Mann-Ballard Ranch will be determined in consultation with stakeholders.</p>
Response LC1-13	<p>A qualified entomologist has been involved in developing the avoidance, minimization, and/or mitigation measures for MSB. The measures listed in the Final EIR/EA with FONSI have been revised to reflect USFWS's Biological Opinion (USFWS 2016b) and adequately address the impacts to and commensurate mitigation for MSB and CRLF. Details will be further refined during the permitting phase of project development.</p>
Responses LC1-14 and LC1-15	<p>Caltrans appreciates receiving this type of information, which can be helpful and will be carefully considered during the project design phase.</p>

Response LC1-16	<p>The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location for the project to provide beach access. South of Scotty Creek, there are no public parcels and so beach access cannot be proposed at these locations. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. Caltrans will continue to refine its public access features to include ADA accessibility and this will be further refined during the Coastal Development Permit process.</p>
Response LC1-17	<p>The environmental review, consultation, and any other action required in accordance with applicable federal laws for this project was carried out by Caltrans under its assumption of responsibility pursuant to 23 United States Code (USC) 327. Documentation has been prepared in accordance with legislation established under the United States Department of Transportation Act of 1966 (49 USC 303; 23 USC 138). Coordination with applicable agencies regarding this process is ongoing, and Caltrans will continue to engage in this process as required by law.</p> <p>Since the circulation of the Draft EIR/EA, Section 4.2.1 of the Section 4(f) <i>De Minimis</i> Determination in Appendix B has been modified to note that no part of the historic property is being incorporated into a transportation facility, and as the primary facades of the historic properties face the ocean, there are no indirect visual impacts and therefore no use.</p>
Response LC1-18	<p>All cultural technical studies and summary documents received peer reviews from cultural resource professionals who meet the Secretary of the Interior Standards and are certified as Professionally Qualified Staff under the Section 106 Programmatic Agreement. Identification and evaluation efforts received concurrence from the State Historic Preservation Officer (SHPO).</p> <p>Archaeological information and technical studies are not released for public review due to the confidential nature of archaeological data and per California Government Code sections 6254.10 and 6254(r); California Code of Regulations Section 15120(d); and Section 304 of the National Historic Preservation Act of 1966.</p> <p>The draft report, "Historic Resources Inventory and Evaluation Report, Scotty Creek Restoration, Gold Ridge Resource Conservation District Sonoma County California," is not a Caltrans document. It was provided to Caltrans as a professional courtesy when Caltrans was conducting research for its report. Caltrans is not responsible for circulating another agency's draft report, nor is it its policy to do so.</p>
Response LC1-19	<p>While a number of archaeological sites were identified within a half mile of the project area, Caltrans analysis focused on the six sites identified within the project's Area of Potential Effect (APE).</p>
Response LC1-20	<p>Caltrans' Native American consultation with the Federated Indians of Graton Rancheria and the Kashia Band of Pomo Indians of Stewarts Point Rancheria is ongoing. Caltrans regularly updates Tribes on the status of the project and provides draft copies of all archaeological technical studies for review and comment.</p>
Response LC1-21	<p>The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual and architectural resources within the project area. Various environmental considerations, including visual resources impacts and impacts to architectural resources, were evaluated in order to achieve a balance between multiple environmental resources. The Preferred Build Alternative, Alternative 19A, best balances potential impacts to multiple environmental resources.</p> <p>Since 2007, Caltrans design engineers and environmental specialists have continually refined the project design in an effort to avoid or reduce impacts as much as possible to many different environmental resources. In addition to constraints associated with visual quality and cultural resources, other environmental constraints related to the project design included the need to: 1) avoid the projected year 2100 erosion line along the coastal bluffs; 2) minimize impacts to the Scotty Creek floodplain; 3) continue to provide access to existing property owners; and 4) avoid future storm event flood elevations. Over 20 project design alternatives/variations were evaluated as part of the project selection process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still complying with Caltrans design standards and constraints.</p> <p>As a result of further environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative because it best avoids or minimizes impacts to all sensitive resources in the project area.</p>
Response LC1-22	<p>The Draft EIR/EA evaluated various environmental resources and impacts in order to achieve a balance between these multiple environmental resources. The Preferred Build Alternative, Alternative 19A, best balances potential impacts to multiple environmental resources.</p>

Response LC1-23

In the preparation of the Draft EIR/EA and notification of public availability and public open house, Caltrans followed the requirements of CEQA and NEPA.

Letter LC2



August 23, 2015

Mr. Oliver Iberian, Branch Chief
 Office of Environmental Analysis
 California Department of Transportation Dist. 4
 Att: Brian Gassner
 111 Grand Avenue, MS8B
 Oakland, CA 95612

Via Email: gleasonrealignment@dot.ca.gov

Comments on Gleason Beach Highway One Realignment

Dear Mr. Oliver:

Thank you for the opportunity to comment on the Gleason Beach Highway One Realignment and its impact on Scotty Creek. The Redwood Empire Chapter of Trout Unlimited (redwoodempiretu.org) represents 600 angler conservationists in Northern California. Our National Organization has 150,000 members nationwide (tu.org). Our membership is particularly interested in the recovery of our Coho Salmon (Silver Salmon) and Steelhead Trout fisheries in our region from Salmon Creek to the Eel River.

We note that the California Department of Fish and Wildlife identified 2 miles of Coho Salmon habitat in the Scotty Creek in a stream inventory report from 1965. http://www.krisweb.com/biblio/southsonoma_cdfg_jones_1965_scotty.pdf

LC2

“The silver salmon were also found to range in two class groups. The smaller sized class ranged in size from approximately 3/4 of an inch to one and a half inches with another class size of approximately 3 to 5 inches. Their abundance was approximately 65 per 100 feet of stream. The abundance of the larger class size was approximately 5 per 100 feet of stream. Success and condition was good.”

“Overall the Silver Salmon appeared to outnumber the steelhead and/or rainbow trout”.

It is habitat such as this that must be restored if we are to see a recovery of the Coho Salmon from its Endangered status and the Steelhead Trout from its Threatened status. The Coho salmon’s endangered status requires that the State take all possible measures to improve its habitat when the opportunity arises such as it does with this Highway 1 project.

Mr. Oliver Iberian, Branch Chief

August 23, 2015

Page 2

LC2

Improvement of fish passage by removal of the box culvert is an excellent first step to facilitate easier migration. But the channel above the box culvert is in serious need of restoration which the landowners, the Ballards have been pursuing for a number of years. Riparian cattle fencing was been installed in the stream-way using public funds as a start on the restoration. This restoration requires the stream to have a healthy riparian vegetation zone along the stream such as willows to shade the water and provide suitable pool riffle stream elements typical of a salmonid stream in this region.

We agree with the comments below from the landowner regarding the wisdom of planning the restoration FIRST and then the roadway as was done on Scott Creek in Santa Cruz County. The Scott Creek approach was a welcome change in Caltrans policy and should become the new standard. It should be applied to Scotty Creek. The Ballard's comments included the following:

LC2

- "1. Restoration of Scotty Creek. The creek habitat is currently unsuitable for supporting salmon yearlings due to the lack of year-round pools and shading vegetation in the first ~400 yards upstream from the roadway. This area was flooded and denuded in the storms of 1984 and has never recovered. An engineering plan has been developed to restore Scotty Creek but implementation has been delayed due to both funding issues and uncertainty about the impact of the highway realignment project. Whereas removal of the culvert under the existing highway, as proposed, will improve the flow of Scotty Creek at the beach and facilitate salmon migration, additional restoration is needed to support the successful spawning and survival of salmonid. The Caltrans Environmental Impact Report does not address this issue as part of their mitigation for disturbance of the wetlands. We propose that Caltrans proceed to restore Scotty Creek ahead of the roadway and bridge construction as was done for Scott Creek in Santa Cruz County. Creek restoration will provide a highly visible improvement to the wetlands in support of the mitigation obligation of Caltrans as well as improving salmon habitat."

Thank you for considering this critical habitat for Coho Salmon in your plans for the bridge over Scotty Creek and the restoration of the stream below into healthy habitat once again.

During the riparian fence project we had an opportunity to make a short video of a juvenile Steelhead in Scotty Creek above the project area that you might enjoy:
https://www.youtube.com/watch?v=_JBDzfr5JKk

Sincerely,
REDWOOD EMPIRE CHAPTER
TROUT UNLIMITED



R. Brian Hines, Board member RETU Board of Directors
California TU National Leadership Council (NLC) representative

Response to Comment Letter LC2: Redwood Empire Chapter, Trout Unlimited

Response LC2

Thank you for your comments. The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. Caltrans recognizes the potential value in improving streambed conditions for salmonids. In addition, although not a mitigation requirement commensurate with impacts to this project, Caltrans will be coordinating with resource agencies as part of the permitting phase of the project to review opportunities for improving conditions within Scotty Creek and its associated riparian corridor.

From: sonomacoastsurfrider@comcast.net
Sent: Saturday, August 22, 2015 3:39 PM
To: Gleason Realignment@DOT
Subject: re: DEIR Comment
Attachments: Scotty Creek DEIR Comments.docx



The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 100,000 members and 90 chapters worldwide.

Dear Oliver Iberien,

Please continue to include the Sonoma Coast Chapter of the Surfrider Organization as an interested party to receive notices and information for the scoping meeting (s) associated with the Draft Environmental Impact Report released for the State Route 1 Gleason Beach Roadway Realignment Project. Our organization is requesting to be a stakeholder in this process.

We are interested in all aspects of the project and particularly concerned about impacts to coastal resources, public access, and public recreation.

Public Notice:

These comments on the proposed Gleason Beach Roadway Realignment Project Draft EIR/EA are intended to document Caltrans' failure to comply with the California Environmental Quality Act (CEQA) by not holding any public hearings on the Draft EIR/EA, to verify Caltrans' failure to circulate in timely fashion the Visual Impacts Study document in order to allow adequate public review before the comment deadline, and to provide general comments on inadequacies in the Draft EIR/EA.

While the displays at the July 29, 2015 Bodega Bay meeting were plentiful, not a single pictorial image included the scale of each alternative when measuring from the mean high tide line to the border of the Ballard Ranch (East to West) and appeared to be "off scale". Unfortunately, the Caltrans "Visual Impacts Study" was also not made available to the public in a timely manner which would have allowed for a more critical public comment opportunity.

LC3-1

LC3-1
(cont'd)

In addition, although the July 29, 2015 Bodega Bay meeting advertised as an "Open House Public Question/Answer Panel for the Draft Environmental Impact Report/Environmental Assessment for the Gleason Beach Roadway Realignment Project" was promoted by Caltrans in their outreach mailer as being held "to solicit comments and questions on the environmental analysis and impacts evaluated in the Draft Environmental Impact Report/Environmental Assessment (EIR/EA) prepared for Caltrans proposed project to realign State Route 1 at Gleason Beach in Sonoma County", this meeting instead began with an announcement by the Caltrans representatives present stating that "no record will be made of this meeting". This belated announcement by Caltrans to a room full of interested local citizens, most of whom had turned out in anticipation of being able to speak on the record for this Project, obviously had a dampening effect on the number and content of any oral presentations by the public and precluded public comment from being documented.

LC3-2

Local Coastal Plan Amendment Required:

The proposed Gleason Beach Roadway Realignment Project (Proposed Project) will clearly require an amendment to the Sonoma County Local Coastal Plan. For this and the reasons aforementioned, a full public hearing on the Draft Environmental Impact Report/Environmental Assessment for the Proposed Project, to comply with CEQA, will be essential. We hereby request that Caltrans hold one or more public hearings in which a **WRITTEN** record of the proceedings is formally collected and in which the "Visual Impact Study" is made available to stakeholders and the public prior to that meeting.

LC3-3

Please ensure that all additional scoping meetings, particularly in regards to the design process, take place in Bodega Bay and that public notice should at a minimum be posted at the Bodega Bay Post Office on Smith Ranch Road in Bodega Bay. A majority of Bodega Bay residents receive mail by PO Box; it is a central place with an inside and outside posting location to maximize informing local residents and interested parties.

We also request that Caltrans increase the number of mailings to include all resident PO Boxes in Bodega Bay as well as Jenner (the bordering communities to the North and South of the project) so that the public most familiar with this area and whose commute will be most impacted will be adequately notified of upcoming meetings. It would also be helpful if notices were displayed in a timely fashion at Jenner Community Center, Jenner Post Office, and Pelican Plaza in Bodega Bay, as well as in local publications such as the Sonoma County Gazette in addition to the Santa Rosa Press Democrat.

LC3-4

Impacts to Wildlife and Plant life:

It is disconcerting that several species of concern, including Myrtle's Silverspot Butterfly, California Red-Legged Frog, and two salmonid species, are not given clearly formulated recovery plans for this project. Measures should be taken to ensure the least amount of interference with these species on the construction site. The Draft EIR includes many vague statements about minimizing effects, such as "except where critical", "smallest amount feasible", and "avoided where possible". These statements will not uphold high mitigation standards and we request that more specific planning and wording is used in the Final EIR.

LC3-5

Of particular concern is the compensatory mitigation effort for Myrtle's Silverspot Butterfly. Funding habitat enhancements elsewhere along the Sonoma Coast is not proficient mitigation for potentially devastating habitat damage at the construction site. The Sonoma Coast State Park covers a large swath of land and more detailed information about the specific enhancement location, as well as reasons for being chosen, should be included in the Final EIR. At the very least, the Myrtle's Silverspot Butterfly habitat enhancement should be completed before the start of construction and alteration of the current environment in order to provide adequate habitat for this endangered species.

LC3-6 There is additional concern about the construction itself, not just the conversion of habitat, affecting the Myrtle's Silverspot Butterfly. The flight season of this rare butterfly is from June-September and heavy construction during these months in an area the species have habitually visited could be detrimental to the population. We encourage the life cycle of this species to be taken into consideration for the construction schedule in addition to the pre-construction surveys for larvae on Western Dog Violet. Western Dog Violet was not listed as a special-status plant, but should be treated as such due to its importance to the endangered Myrtle Silverspot Butterfly.

LC3-7 We are also concerned that the utmost care is taken with re-vegetation in the construction zone. The Draft EIR discusses the use of native species, in addition to typical erosion control species and locally typical trees. It is extremely important that biologists familiar with the local ecosystem are consulted and approve the selection of species and design of plantings used for re-vegetation and that a specific list which includes the scientific and common name for each plant.

Consideration of Alternatives:

LC3-8 With any project, there exists a range of possibilities to meet the needs of the project goals. While understanding the need to move the roadway safely inland and protect it from the retreating coastline it is equally imperative to develop a construction plan that accounts for and significantly attempts to reduce the impacts of the project. This includes choosing an alternative which provides the least impact and developing a construction plan that accounts for the protection and breeding patterns of resident and migratory species whether listed or not.

LC3-9 Sensitive wetlands, which provide critical habitat for unique species and that are subject to the provisions of the federal Clean Water Act, are not addressed adequately in the EIR/EA for the Proposed Project, and prior efforts by affected landowners to pursue restoration of salmonid habitat in Scotty Creek appear to have fallen by the wayside. Gleason Beach and the surrounding wetlands area upstream clearly comprise what the Sonoma County Local Coastal Program (LCP) refers to as Environmentally Sensitive Habitat (ESHA) as defined by the California Coastal Commission (CCC). The Proposed Project will impose permanent adverse impacts to the Coastal Prairie ESHA at this location. The wetlands that would be impacted by the proposed realignment project at Gleason's Beach represent some of the only remaining native habitat in that category on the Sonoma Coast, thus the requisite Corps of Engineers wetland permitting protocols involving full compliance with the federal Clean Water Act (CWA) should be observed by Caltrans. The remaining historic ranch house has been well maintained and the associated agricultural accoutrements along Scotty Creek represent a culturally important landmark on the Sonoma Coast, one which should not be casually sacrificed to simply disappearing below an overbuilt bridge project. The loss of this agricultural heritage site would then hypothetically be "mitigated" by a future Caltrans brochure as has been proposed by the Agency. This is inadequate mitigation for such a significant loss

Bridge Design Enhancement Measures:

LC3-10 We request that the public is informed and involved in the design process of the bridge. The Sonoma Coast stretch of Highway 1 is unique and rugged, and anything other than a simple bridge would appear obtrusive.

Impacts to water quality and recreation:

LC3-11 The Surfing Community of Sonoma County requests that the impact on the wave and water quality in the Scotty Creek Floodplain and ocean environment be considered in the Final EIR for the Gleason Beach State Route 1 Realignment Project.

- LC3-12 | *Section 30213 of the Coastal Act* states: “Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.”
Surfing locations are a prime example of low cost visitor and recreational opportunities
- LC3-13 | *Section 30220 of the Coastal Act* further states: “Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.”
- LC3-14 | Surfing in Sonoma County can only be practiced in the ocean and never at inland areas. The Surfrider organization and supporters are particularly protective of surfing locations on the Sonoma Coast, especially the high quality ones, as they are available to the public in very limited supply.
- LC3-15 | We are concerned by the lack of details regarding the temporary creek diversion. Creek diversions can adversely affect species of concern and alter flow course. The sediment outflow from Scotty Creek into the ocean creates a wave that has been historically surfed on the Sonoma Coast and any change in the creek flow could affect this wave. Surfing is a recreational activity that is protected by the Coastal Act.
- LC3-16 | Export of excess sediment, particularly from disturbed and possibly harmful soil, has the potential to degrade the water quality in both Scotty Creek and the inshore connecting portion of the Pacific Ocean. Creek diversion may not adequately minimize the export of disturbed sediment and we are interested in additional or alternative prevention methods.
- LC3-17 | In addition ocean water quality studies should be conducted prior to construction to establish a baseline and throughout the project to measure any impacts to the creek and nearshore waters.
- LC3-18 | **Impacts to Public Access:**
Scotty Creek Beach provides safe access to the ocean which is a rarity along the Sonoma Coast. The public can easily access the sandy beach without scaling a steep bluff. Any project considered by Caltrans should ensure continued and safe access to this beach.

We appreciate the opportunity to comment further and be informed of all relevant information regarding this project.

Thank you,

<p>Cea Higgins Policy & Volunteer Coordinator cea@sonomacoast.ssurfrider.org Sonoma Coast Chapter of Surfrider</p>	<p>Sarah Lecus Sonoma Coast Secretary secretary@sonomacoast.surfrider.org PO Box 2280 Sebastopol CA 95473</p>
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Response to Comment Letter LC3: Sonoma Coast Chapter of Surfrider

Response LC3-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Caltrans will include the Sonoma Coasts Chapter of the Surfrider Organization in all future correspondence related to this project.</p> <p>In accordance with CEQA Guidelines Section 15802 and NEPA (42 USC 4321), a project scoping meeting was held in Sonoma County within the county of the proposed project in 2014. A public open house was held on July 29, 2015 to provide the public an opportunity to obtain information about the project, review project details, ask questions of Caltrans staff, and provide written comments on the Draft EIR/EA. The meeting was announced in the Notice of Availability (NOA) that was mailed to the State Clearinghouse on July 10, 2015. The NOA was also published in the Santa Rosa Press Democrat newspaper.</p> <p>The July 29, 2015 public open house provided the public an opportunity to provide written comments on the Draft EIR/EA. An announcement was made at that meeting that only written comments, such as on comment cards provided at the meeting, via email, or via regular mail, would be recorded and responded to. As required under CEQA, Caltrans collected all comments received via those written mediums and has provided written responses to them in the Final EIR/EA with FONSI document. Caltrans will provide additional public outreach to provide informational updates regarding the project.</p> <p>The Visual Impact Assessment is a technical report used as the basis for the visual resources analysis presented in the Draft EIR/EA. As such, public circulation of the Visual Impact Assessment is not required under CEQA/NEPA. However, that report and other final technical reports prepared for the Draft EIR/EA were made available to the public upon request.</p>
Response LC3-2	<p>Caltrans has complied with CEQA. In accordance with CEQA Guidelines Section 15802 and NEPA (42 USC 4321), a project scoping meeting was held in Sonoma County within the county of the proposed project in 2014. A hearing will likely be held as part of the Coastal Development Permit and/or Local Coastal Plan amendment review as deemed necessary by the reviewing agency. Caltrans has and will continue to provide additional public outreach to provide informational updates regarding the project.</p>
Response LC3-3	<p>Caltrans is committed to public outreach and has made a concerted effort to reach residents through various methods, including posting the open house notice at post offices, sending the open house notice via mail, and posting the information on Caltrans' website. Caltrans personnel visited various community locations in advance of the public meeting and distributed hard copies of the Draft EIR/EA at U.S. Post Offices in Occidental, Bodega Bay and Jenner. The Draft EIR/EA was also distributed at the Occidental Public Library, Central Santa Rosa Library, and Guerneville Regional Library. The Draft EIR/EA was also available online at Caltrans' website. Caltrans used the U.S. Post Office's Every Door Direct Mail program to mail approximately 3,544 notices to post office boxes and rural routes within a 5-mile radius of Bodega Bay, in Bodega Bay, Bodega, Duncans Mills, Jenner, and Occidental, and post office boxes in Monte Rio. The intention was to inform all residents and businesses in the selected areas; an elected official with an office or residence in the selected area would also receive notice. Also, the public open house was publicized via a notice published in the <i>Santa Rosa Press Democrat</i> and online at bodegabay.com.</p>
Response LC3-4	<p>Pursuant to CEQA, Caltrans is required to mitigate for significant impacts. The three alternatives analyzed as part of the Draft EIR/EA evaluated potentially significant impacts and proposed mitigation and avoidance measures where appropriate. Caltrans is not required to provide a recovery plan for the species listed. Avoidance, minimization, and/or mitigation measures have been revised to reflect USFWS's Biological Opinion (USFWS 2016b) and adequately address the impacts to and commensurate mitigation for MSB and CRLF and will be further refined in the permitting stage of the project in collaboration with the relevant regulatory agencies.</p>
Response LC3-5	<p>Based on information provided by a qualified entomologist providing surveys and habitat analysis of the project area and some surrounding areas, the project area is likely supporting transient or dispersing Myrtle silverspot butterflies from population centers north of the project. Avoidance, minimization, and/or mitigation measures have been revised to reflect USFWS's Biological Opinion (USFWS 2016b). Measures will include revegetation for temporarily impacted areas to include the larval host plant and nectar food sources. Mitigation locations and timing will be determined during the permitting process of the project phase.</p>

Response LC3-6	<p>Caltrans has been working with a qualified entomologist (familiar with the Myrtle's silverspot butterfly, its local and regional distribution and natural history) on this project since 2010. Habitat and species surveys of the project area and some adjacent areas have been conducted to understand the value of the project to the butterfly during all of its lifecycle (see Section 2.3.5, Threatened and Endangered Species). This has informed project development and helped to minimize impacts and to develop appropriate and effective mitigation.</p> <p>Caltrans construction activities are not expected to affect butterfly adults due to their mobility and because construction vehicles will be limited to speeds of 5-10 mph in the project area. Pre-construction surveys will be conducted and western dog violet (<i>Viola adunca</i>) that support larvae will be avoided wherever possible.</p>
Response LC3-7	<p>Measure BIO-1: Revegetation in Section 2.3.1, Natural Communities, states that all areas temporarily affected during construction will be revegetated with an assemblage of native species appropriate for the local area. Invasive, exotic plants will be controlled within the biological study area (BSA) to the maximum extent practicable pursuant to Executive Order (EO) 13112.</p> <p>A revegetation and monitoring plan will be approved by relevant permitting agencies which will outline the revegetation and monitoring. This will include success criteria and will optimize plant establishment.</p>
Response LC3-8	<p>Since 2007, Caltrans design engineers and environmental specialists have continually refined the project design in an effort to avoid or reduce impacts as much as possible to many different environmental resources. In addition to constraints associated with visual quality and cultural resources, other environmental constraints related to the project design included the need to: 1) avoid the projected year 2100 erosion line along the coastal bluffs; 2) minimize impacts to the Scotty Creek floodplain; 3) continue to provide access to existing property owners; and 4) avoid floodplain areas where future storms could inundate the roadway and ensure that the bridge soffit elevation is sufficient to keep the bridge deck above water during such storms. Over 20 project design alternatives/ variations were evaluated as part of the project identification process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still complying with Caltrans design standards and constraints. As a result of environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative because it best avoids or minimizes impacts to sensitive resources in the project area.</p>
Response LC3-9	<p>Wetlands habitat and impacts are discussed in Section 2.3.2, Wetlands and Other Waters, in this Final EIR/EA with FONSI and in greater detail in the project's Natural Environment Study (Caltrans 2015d) and Wetlands Delineation Report (Caltrans 2013d). These detailed technical documents are available to the public upon request.</p> <p>The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. The proposed project has been designed to avoid impacts to wetlands as much as possible by designing an elevated structure over much of the wetland area. Caltrans is working to minimize project-related impacts to sensitive environmental resources. Avoidance, minimization, and/or mitigation measures will be further refined in the permitting stage of the project. Caltrans would comply with the Clean Water Act and other relevant environmental permits.</p> <p>The Draft EIR/EA and cultural resources technical documents concluded that the project would result in a substantial adverse change to the Gleason-Mann-Ballard Ranch, and in doing so, states that mitigation will not bring these impacts to below a level of less than significant.</p> <p>The Gleason-Mann-Ballard Ranch house and other buildings would remain after project construction, although a portion of the ranch's open land would be acquired for the proposed project.</p>
Response LC3-10	<p>Caltrans is committed to keeping the public informed of its plans and an informational meeting was conducted in April 2016 to provide the community with an update of the project's plans and roadway and bridge design. One of the goals of the bridge design is to make the structure as visually thin, light and streamlined as possible, with a curving alignment that blends into the local geography. Design modifications and enhancements are called for in Mitigation Measure VISUAL-2: Bridge Design Enhancement Measures, and it is the intent of that measure to facilitate the development of such enhancements during the project design phase. It is Caltrans' intent to design the proposed bridge to be compatible with the landscape as much as possible.</p>
Response LC3-11	<p>The proposed project improvements will enhance water quality and the environment setting by removing the existing Scotty Creek box culverts and allowing for an open channel. This does have the potential to alter the wave impacts. However, the beach at Scotty Creek is not a significant surfing destination, and swimming there is discouraged.</p>
Response LC3-12	<p>The project would have no impact on surfing accessibility within the project area.</p>

Response LC3-13	The project would not hinder or prevent recreational activities along the coast.
Response LC3-14	The project would have no impact on surfing accessibility within the project area.
Response LC3-15	The Scotty Creek diversion plans and specifications will be developed during the design phase and submitted to the appropriate regulatory agencies for review and approval before the start of construction.
Response LC3-16	Caltrans requires the construction contractor to submit a Stormwater Pollution Prevention Plan for Caltrans and regulatory agency review before the start of construction. The plan will include the measures to be implemented, in addition to temporary creek diversion, to protect water quality during construction.
Response LC3-17	Caltrans will perform preconstruction and construction monitoring in compliance with all regulatory requirements and permits.
Response LC3-18	Currently, the public has beach access via private property. The proposed location of the boardwalk would ensure safe public access to the beach via a State-owned access point.

Letter I1

11-1

I Am Concerned About My Sprung Box Along Hwy 1 And A Parcel I own In The field Below it That Was Purchased As A Well Site They Both sit in your Proposed Re-alignment

Dennis McALLISTER 707-875-3581
5550 Hwy 1
Bodega Bay Ca 94923

11-2

COMMENTS

P.S. The Beach you keep calling A Public Beach on The South Side of Scotty Creek Is Private. I've been Pay Taxes on it for 60 yrs.

Also What About The underground utilities That Go Over The Castano Bridge @ Scotty Creek.



GLEASON BEACH ROADWAY REALIGNMENT
Roadway Realignment and Coastal Access in Sonoma County
04 Son 1 (PM 15.1/15.7) EA# 04-0A0200

Comments must be received on August 23, 2015 by 5pm
Email: gleasonrealignment@dot.ca.gov
www.dot.ca.gov/dist4/enrdocs.htm

Response to Comment Letter I1: Dennis McAllister

Response I1-1

Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. As part of the environmental review process, three project alternatives were evaluated in the Draft EIR/EA. In part, due to a potential impact to wells associated with implementation of Alternative 20, that alternative has been eliminated from further consideration. Moving forward, design refinements to the Preferred Build Alternative, Alternative 19A, will be made to ensure the project would not negatively affect wells in the project area.

Response I1-2

Since the circulation of the Draft EIR/EA, the Final EIR/EA with FONSI has been modified to note that the beach where Scotty Creek empties into the ocean that is sometimes locally referred to as "Gleason Beach" is in fact an unnamed beach that is not a part of the Sonoma Coast State Park (State Parks 2014), and that a portion of the beach on the southern side of Scotty Creek is privately owned and another portion is publicly owned.

The project design and implementation phases will involve identifying the existing utilities in the project area that would be potentially affected by the project. Some utility relocations may be required, but all existing utility services will be maintained. Caltrans would coordinate with the relevant utility companies, and utilities would be avoided or relocated as needed.

I2-1

COMMENTS

Please plan for a pedestrian
and bicycle pathway as part
of the project.

Perry Marker
1030 Hwy One
perrymarker@comcast.net

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Roadway Realignment and Coastal Access in Sonoma County
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Response to Comment Letter I2: Perry Marker

Response I2-1

Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Since the circulation of the Draft EIR/EA, the Final EIR/EA with FONSI has been modified to address pedestrian and bicycle access which would be accommodated on the new SR 1 alignment. Caltrans would also provide a pedestrian and bicycle bridge over Scotty Creek, if feasible. The dimensions of the elevated bridge have been modified from what was described in the Draft EIR/EA to more safely accommodate multimodal transit. The updated proposed bridge is planned to be 49 feet wide with a 6- to 8-foot shoulder and 6-foot sidewalk in the southbound direction and a 6- to 8-foot shoulder in the northbound direction. These shoulder dimensions would be wider than shoulders along existing SR 1 and would better allow for multimodal use of the project corridor compared to existing conditions.

Letter I3

I3-1

COMMENTS

① Current Road + Parking areas along Hwy one going South to Salmon Creek has numerous man made (state) drainage problems that are causing extreme erosion + bluff retreat - Fixing these areas now would prevent more serious problems in the future... This is a maintenance issue more than a sea level rise issue. please call or email me and I would be happy to walk that area + point them out to you. David Carey (707) 480-6384 or careynordh@gmail.com

GLEASON BEACH ROADWAY REALIGNMENT
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I3-2

COMMENTS

② The viewing platform proposed for Scotties creek is totally out of character for this wild, beautiful + rare scenic area. If access is necessary perhaps a easement could be obtained from Dennis McAlister who owns the property. If this was not a possibility - then I would propose a much less offensive ~~viewing~~ viewing area + access. I see numerous other problems will be caused by this platform + access - If proposed access must be built please do NOT create the steps + structure leading to the beach

David Carey
 careynordh@gmail.com

GLEASON BEACH ROADWAY REALIGNMENT
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13-3

COMMENTS

③ Gleason Beach south to Salmon Creek is has many narrow spots with ~~lots~~ a cliff to the ocean + houses close to the Eastern side of the highway. Erosion along much of this area is caused by road + parking areas channeling water causing severe erosion. If these areas were maintained it would greatly forestall having to ~~to~~ move the highway + it would also save many houses. I have walked this coast for 14 years + have seen much erosion + due to these man made structures
 David Carey - careynordh@gmail.com

I would be happy to point these out to anyone. Please contact me. David Carey (707) 480-6384

GLEASON BEACH ROADWAY REALIGNMENT
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www.dot.ca.gov/dist4/enydocs.htm

Response to Comment Letter I3: David Carey

- Response I3-1 Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Portions of the roadway are vulnerable to coastal erosion due to ocean wave action along the coastline (Caltrans 2014g). In addition to coastal erosion, SR 1 through the community of Gleason Beach is being undermined by sources such as groundwater seepage and surface water runoff (Caltrans 2015f), which have eroded the coastal bluffs and portions of the roadway within the project limits. Drainage and erosion issues within the limits of the project area will be considered and addressed as part of the project design.
- Response I3-2 The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location for the project to provide beach access. South of Scotty Creek, there are no public parcels, therefore an easement on private property would not be considered and so beach access cannot be proposed at these locations. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. This feature will be further refined during the Coastal Development Permit process.
- Response I3-3 Erosion issues and concerns within the limits of the project area are being considered and will be addressed as part of the project design.

Received 7/29/2015 @ Public Meeting

July 2015

Comments on Gleason Beach Highway One Realignment Project: Caltrans Draft Environmental Impact Report/Environmental Assessment, June, 2015—copy available at (<http://www.dot.ca.gov/dist4/envdocs.htm>)

Prepared by Philip and Roberta Ballard, 6000 Highway One: ballardp@peds.ucsf.edu; roberta.ballard@ucsf.edu

- 14-1 1. Restoration of Scotty Creek. The creek habitat is currently unsuitable for supporting Coho salmon and steelhead yearlings due to the lack of year-round pools and shading vegetation in the first ~400 yards upstream from the roadway. This area was flooded and denuded in the storms of 1984, in part because of debris blockage of the culvert, and has never recovered. An engineering plan has been developed to restore Scotty Creek but implementation has been delayed due to both funding issues and uncertainty about the impact of the highway realignment project. Whereas removal of the culvert under the existing highway, as proposed, will improve the flow of Scotty Creek at the beach and facilitate salmon migration, additional restoration is needed to support the successful spawning and survival of juvenile salmon. The Caltrans Environmental Impact Report does not address this issue as part of their mitigation for disturbance of the wetlands and the long-term effects of the culvert on salmon migration and habitat in the creek. We propose that Caltrans contribute to restoration of Scotty Creek, which could occur in concert with construction of the new highway. Creek restoration will provide a highly visible improvement to the wetlands in support of the mitigation obligation of Caltrans as well as improving salmon habitat.
- 14-2 2. Access to Gleason Beach. Both local residents and visitors to the area will require continued safe access to Gleason Beach at the mouth of Scotty Creek. The current proposal for the realignment provides beach access via a wooden walkway and stairs from the existing highway just north of the creek over the bluff adjacent to the property of Peggy Vaughan. This is not a desirable option because 1) the entrance to the beach will be under water at high tide, 2) the route is directly adjacent to the Vaughan property and at the same elevation, which raises major privacy and security issues for the occupants, 3) the route will encourage climbing on the bluff that will promote erosion, and 4) there will be no easy access for beach-goers approaching from the south side of the creek with the culvert and highway removed at the creek, encouraging some to climb down the creek-side to enter the beach along the creek, again promoting erosion. Instead of the walkway, we propose stone/concrete steps to the beach from the existing roadway down the roadside incline on the south side of Scotty Creek (rip-rap rock slope protection area). Also, we propose that Caltrans build a pedestrian/bicycle bridge over the creek connecting the old roadway, providing beach access from north of the creek. This option also allows an easy and safe walking route for walkers on the Coastal Trail and residents on both sides of Scotty Creek.
- 14-3 3. Alternative designs. All three current highway designs (19A/B, 20) obviously will impact cultural and natural resources as well as the quality of the viewshed and property values, and the goal of all interested parties is to minimize these effects. In our opinion, option 20 is the least desirable route of the 3 alternatives because of 1) includes two, separate curves on the bridge and a retaining wall at the beach, 2) the bridge is the furthest inland of the 3 alternatives with greatest impact on wetlands and views, 3) the bridge is closest to the spring and tank for ranch domestic water and likely obliterates the roadside box spring owned by

I4-3
(cont'd)

Dennis McAllister. Of the 3 current options, we favor Route 19A, which is further from both springs, avoids the spring archeological site, and provides a safer design for bridge curves and the south access road between the old and new roadways.

I4-4

4. Access to Highway One and beach parking. The roadway realignment will substantially impact ingress and egress for occupants, visitors and emergency vehicles to the Gleason/Scotty Creek beach area, in particular 5773, 5550 and 6000 Highway One properties. The Environmental Impact Report does not address traffic issues on the old roadway on both sides of Scotty Creek after realignment. Traffic will be very congested on weekends and holidays as visitors look for parking, which currently is served by only one proposed parking area north of the creek. This will likely lead to visitor parking on the edge of the old roadway and in the driveways of adjacent properties both south and north of Scotty Creek, restricting access by occupants as well as access for first responders reacting to incidents at the beach or on adjacent properties. We disagree with the assessment of No Impact for traffic patterns and emergency access as stated in the CEQA Environmental Checklist on page 364 of the Draft Environmental Impact Report. We believe that the traffic issue deserves further study by Caltrans and a solution acceptable to property owners, Bodega Bay Fire Department, Sonoma County Sheriff's Department, California Highway Patrol, California Park Rangers and any other interested parties.

I4-5

A preferable alternative is to designate the old highway south of Scotty Creek as a driveway and install a restricted, password-required entrance gate for use by local residents, first responders and delivery vehicles. This will eliminate traffic congestion and parking issues in this area. For the north section of the old highway, traffic can be reduced by elimination of the proposed parking area and walkway to the beach. In this case, access to the McAllister (Gleason) Beach would be via Portuguese Beach and the existing parking area there. The 2 beaches are contiguous (except at very high tide) and thus access to the McAllister Beach is provided as required by the California Coastal Commission. Additional advantages of this plan are the cost savings for the project and that beach visitors will no longer need to trespass on the McAllister property to reach the beach.

BRIEF HISTORY OF SCOTTY CREEK AND SALMONID

August 22, 2015

Prepared by Philip and Roberta Ballard, 6000 Highway One: ballardp@peds.ucsf.edu;

roberta.ballard@ucsf.edu

- Scotty Creek is the largest watershed between Salmon Creek and the Russian River and lies near the border of Coast Miwok and Pomo tribal areas. The numerous middens along the creek indicate that the area was a seasonal site for Native American food gathering activity related to shellfish, surf smelt and migrating salmonid. Historically, according to CDFG in 1965, Scotty Creek supported both steelhead and Coho salmon.
- Highway SR 1 crosses Scotty Creek on a constructed berm through the wetlands near the beach. In 1952 a culvert was installed for the highway, and this was widened in 1959. During the storms of 1984, blockage of the culvert by debris caused flooding throughout the wetlands with water levels up to 2 feet deep within the house and barns in the valley. The vegetation along lower Scotty Creek was denuded and many natural pools, riffle crests and curves in the lower 400 yards of the creek were obliterated.
- The riparian corridor along Scotty Creek has never recovered. Although some salmonoid have been observed in pools of lower Scotty Creek in recent years, indicating some continued fish migration, these pools dry up in late summer and no surviving fish have been reported.
- The current state of Scotty Creek as a unsuitable habitat for salmonid is clearly multi-factorial: the culvert impedes migration of salmon upstream; the culvert historically has contributed to loss of riparian cover/shading and changes in stream character and flow; erosion of stream banks and degradation of water quality by cattle that graze the ranch.
- An effort to restore Scotty Creek by the current owners at 6000 SR 1 began in 2004 with support and funding from Gold Ridge Resource Conservation District to install fencing along the north side of the creek and to design engineering plans for improving water flow, development of riffle crests and pools, and planting of creek-side vegetation.
- In 2007, an EQIP application to Natural Resources Conservation Service (NRCS) of the Department of Agriculture was approved to partially fund the restoration. A new spring and storage/watering facility was developed on the north side of the creek to provide an alternative water source for the cattle. However, stream restoration did not proceed because the NRCS was concerned about the unknown impact of the Caltrans realignment project on the proposed restoration plan. In 2013, NRCS funding was withdrawn.
- We propose that full restoration of Scotty Creek occur as part of the highway realignment project, and that Caltrans increase their contribution to the restoration as mitigation for the impact of the culvert over the past 60 years. In the current draft EIP, Caltrans proposes to remove the existing culvert and widen the outflow channel as mitigation. While these measures will improve salmonid access to Scotty Creek, they will not allow for survival of salmonoid--this will require reestablishment of year-round pools with riparian cover.
- Full restoration will require grading and shaping banks of the creek, development of riffle crests and pools including rock and log placement, planting of stream-side vegetation, seeding, development of a temporary watering system for new plantings, and repair and extension of fencing to exclude cattle from the creek. Engineering plans for this project are available and only need updating to include any changes in creek topography, the proposed removal of the culvert, widening of the outlet and potential impact of the bridge columns adjacent to the creek.

14-6

Response to Comment Letter I4: Philip and Roberta Ballard

Response I4-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. Caltrans recognizes the potential value in improving streambed conditions for salmonids, and although not a mitigation requirement commensurate with impacts to this project, Caltrans will be coordinating with resource agencies as part of the permitting phase of the project to review opportunities for improving conditions within Scotty Creek and its associated riparian corridor.</p>
Response I4-2	<p>The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location option for the project to provide beach access. South of Scotty Creek, there are no public parcels and so beach access cannot be proposed at these locations. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. Caltrans will continue to refine this feature to take into consideration privacy and security of the nearby residents and to ensure the bluff stability, during the Coastal Development Permit process.</p> <p>Regarding the comment to build a bridge over Scotty Creek connecting the old SR 1 roadway, Caltrans is now proposing to include a pedestrian/bicycle bridge over Scotty Creek at this location, if feasible. Caltrans supports efforts to enhance public access and has worked closely with related agencies and the public to include pedestrian and bicycle access on the new SR 1 alignment.</p>
Response I4-3	<p>As a result of Caltrans' evaluation of potential environmental impacts associated with the three alternatives discussed in the Draft EIR/EA and public input, Alternative 19A was selected as the Preferred Build Alternative. Your support of Alternative 19A is noted.</p>
Response I4-4	<p>Implementation of Alternative 19A, including removal of the Scotty Creek culverts, would result in the loss of about 12 informal parking spaces located along existing SR 1. This loss of parking would be offset by construction of a parking pad north of Scotty Creek that would accommodate up to 12 vehicles.</p> <p>South of Scotty Creek, the existing shoulders and informal parking areas would remain as-is. To address existing (and future) parking/traffic concerns, coordination between Caltrans and the Sonoma County Sheriff's Department, California State Parks and California Highway Patrol will be required.</p>
Response I4-5	<p>For any alternative, Caltrans is required to maintain access to the realigned SR 1 for all property owners/parcels. In addition, Caltrans must adhere to the California Coastal Act (which is administered by Sonoma County and the California Coastal Commission) and maintain existing beach access. The current Preferred Build Alternative satisfies these requirements. However, during the permitting process, Caltrans will further develop and refine the beach access plan to address these policies and any other possible alternatives.</p>
Response I4-6	<p>The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. Caltrans recognizes the potential value in improving streambed conditions for salmonids, and although not a mitigation requirement commensurate with impacts to this project, Caltrans will be coordinating with resource agencies as part of the permitting phase of the project to review opportunities for improving streambed conditions riparian corridor within and adjacent to Scotty Creek.</p>

8/19/15

To John or Hank From Bill Magee 7075469452
 the second turn off north of the
 new bridge dead ends into a 80' deep ravine
 the new highway needs a French drain to
 rock on East side of road. The subsurface
 water erodes under our houses. Your new
 drain emptys into a \$500,000.00 repair area
 why are you putting a parking area for
 a private owned beach? No overnight parking!
 who takes care of old highway? Can we buy
 some of it? can we plant next to road?

Safety of Traffic to private beach, water under overburden
 causes our slides in rear 6167 Highway 1 Bodys Bay

COMMENTS



GLEASON BEACH ROADWAY REALIGNMENT
 Roadway Realignment and Coastal Access in Sonoma County
 04-Son 1 (PM 15.1/15.7) EA# 04-0A0200

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15-1

15-2

15-3

15-4

Response to Comment Letter I5: Bill Magee

- Response I5-1 Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County.
- The use of a French drain with rock slope protection or alternate drainage options would be determined during the design phase and will consider and address potential impacts to areas downstream of the drainage outfall.
- Drainage options during the design phase will investigate this repair area and will design drainage to either avoid this area or not undermine existing repairs.
- Response I5-2 Though a portion of the beach is privately owned, a State-owned parcel immediately north of the privately owned beach parcel would be used for public beach access. To address existing (and future) parking/traffic concerns, coordination between Caltrans and the Sonoma County Sheriff's Department, California State Parks and California Highway Patrol will be required.
- Response I5-3 Upon project implementation, the existing (abandoned) section of SR 1 would continue to be maintained by Caltrans until an agreement is made with another entity that would then assume maintenance responsibilities. Therefore, existing provisions related to what uses and activities are currently allowed on that right-of-way would continue to apply for the time being.
- Response I5-4 To address existing (and future) parking/traffic concerns, coordination between Caltrans and the Sonoma County Sheriff's Department, California State Parks, and California Highway Patrol will be required. The use of a French drain with rock slope protection or other feasible alternative, or alternate drainage options, would be determined as the project design is further refined and after geotechnical drilling is completed. Caltrans will consider and address potential causes of the slides.

Gleason Beach Highway 1 Realignment Project Comment Form

August 14, 2015
Peggy Vaughan, Owner of 5877 Highway One
3 Herrera Drive
Fairfax, CA 94930
415-453-5820
Peggy.Vaughan@ucsf.edu

Walkway/Beach Access

I6-1

1. The wooden walkway to the beach at the north side of Scotty Creek is not a viable option for many reasons.
 - a. The walkway is level with my yard and deck. It seems clear that whoever planned it did not know my house was there. My house does not show up on many of your photos because it is small (only 600 sq. ft. but with a large yard) and is hidden by trees that I planted for privacy. People seem to think it is an out-building for the large house next door, but it is not. For years I have had to deal with people parking across my driveway and coming up from the beach and using my yard and deck. Also, one-half cord of firewood has been stolen during the last several months, probably to make fires on the beach, and this is an expensive loss. I have put a fence around the property, put up trees, and have moved the woodpile away from the yard perimeter so that it is not visible from the beach. With the proposed walkway the entire yard will be visible and fairly accessible. My privacy, safety, view, and property value will be significantly impacted.

I6-2

- b. The pictures and plans available at the public workshop on July 29th, 2015, did not show Scotty Creek flowing. That flow is significant. When the creek is flowing, as it usually does much of the year, even with a small amount of rain, there is no access to the beach south of the proposed walkway because it is not possible to cross the creek and is dangerous if tried. People will definitely try to cross (including children) and safety will be a major issue.

The usable part of the beach is to the south and is heavily used by families, children, many surfers, runners, dogs, picnickers, etc. There is almost no walkable beach to the north. As planned, the walkway is essentially a walkway to nowhere.

I6-3

Parking and Access to Homes and Properties

2. Plans for parking and access after the road is re-aligned seem completely inadequate.

16-3
(cont'd)

a. There are usually 15 to 25 vehicles parked along both sides of Highway One at Gleason Beach, especially on weekends and vacation times. It seems that there is no plan (or at least it isn't evident) to accommodate that many vehicles. This needs a great deal of attention, because without planning for many, many spaces, our driveways and access will be blocked. This will also lead to safety issues on both the north and south sides of Scotty Creek. For years I have posted "No Parking" signs at my driveway and people still park across it.

16-4

b. It appears that the roadway to the north of Scotty Creek, just south of my driveway, will be completely removed. My driveway has to be entered from the south so that anyone coming from the north has to go past the entrance and turn around in the ranch driveway (at 6000 Highway One) in order to approach my entrance from the south. This a major problem because as it is planned; I will no longer have access to the ranch driveway or any appreciable area in which to turn around and enter my driveway from the south. This is also a major safety issue for the Fire Department and other First Responders as well as large trucks used for delivering gravel for my driveway and pumping out the septic tank, etc.

16-5

Note:
I strongly agree with the comments you have received from Dr. Phil Ballard, who lives at 6000 Highway One, regarding his proposal of installing stone/concrete steps to the beach from the existing roadway. It appears these steps could be constructed to the beach from the road south of Scotty Creek using the roadside right of way that Caltrans must own. Thus these steps would not be on private property. It would certainly be less costly than the disastrous walkway proposed close to my property.
Dr. Ballard also suggested in his comments that there could be a pedestrian/bicycle bridge constructed over the creek connecting the north and south parts of the old roadway. This will provide access to the steps to the beach for visitors arriving from the north side of the creek. This will also provide a safe route for walkers on the proposed Coastal Trail and residents on both sides of Scotty Creek. Without this those of us to the north will not have beach access without driving and parking on the south side.

16-6

In conclusion, it seems that there has not been adequate public input and discussion for such a huge project. The entire situation deserves much more study and more collaboration with the property owners who will be greatly affected. There are so many very important issues that have not been adequately considered by the planners and designers.

Response to Comment Letter I6: Peggy Vaughan

Response I6-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Caltrans appreciates the information provided by the commenter. This type of information will be useful as the project design is further refined. The final project design will reflect feedback provided by the public, as well as existing site limitations. The location where the boardwalk would be built is the only State-owned parcel of land that can be used to provide public beach access.</p>
Response I6-2	<p>The location where the boardwalk would be built is the only State-owned parcel in the project area that would provide public beach access. Caltrans will continue to address safety considerations to reduce potential for incidents such as described in the comment during the design phase of the project.</p>
Response I6-3	<p>Caltrans' long-term plan for this area is to protect SR 1 from coastal erosion and to provide continued access to the area. Implementation of Alternative 19A, including removal of the Scotty Creek culverts, would result in the loss of about 12 informal parking spaces located along existing SR 1. This loss of parking would be offset by construction of a parking pad north of Scotty Creek that would have space for up to 12 vehicles. South of Scotty Creek, the existing shoulders and informal parking areas would remain as-is.</p>
Response I6-4	<p>The project includes a turnaround located just north of Scotty Creek that would allow vehicles to turn around and access the driveway. The turnaround would be sized to allow trucks the ability to turn around. It is possible that as the project design is further refined, the existing driveway can be modified to allow vehicles to enter from the southbound side.</p>
Response I6-5	<p>The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location option for the project to provide beach access. South of Scotty Creek, there are no public parcels and so beach access cannot be proposed at these locations. The current beach access is through private property. The project would provide beach access via a publicly owned access point. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. This feature, including building materials, will be further refined during the Coastal Development Permit process.</p> <p>Caltrans supports efforts to enhance public access and has worked closely with related agencies and the public to include pedestrian and bicycle access on the new SR 1 alignment, as well as a pedestrian and bicycle bridge over Scotty Creek, if feasible. Regarding the California Coastal Trail, under the preferred Build Alternative 19A, bicyclists and pedestrians would retain through access in the project area via the use of the proposed new SR 1 roadway shoulders. Since the circulation of the Draft EIR/EA, the dimensions of the elevated bridge as described in the Draft EIR/EA for Alternative 19A have been modified in the Final EIR/EA with FONSI to be planned as 49 feet wide with a 6- to 8-foot shoulder and 6-foot sidewalk in the southbound direction to accommodate pedestrian and bicycle access, and a 6- to 8-foot shoulder in the northbound direction. These shoulder dimensions would be much wider than shoulders along existing SR 1 and would better allow for multimodal use of the project corridor compared to existing conditions.</p>
Response I6-6	<p>Caltrans held a public scoping meeting to receive comments from local residents as well as to receive comments on the publicly circulated Draft EIR/EA. Other meetings at the site with property owners have informed Caltrans' design of the proposed SR 1 realignment to minimize impacts to local residents. Caltrans is committed to keeping the public informed of its plans and an informational meeting was conducted in April 2016 to provide the community with an update of the project's plans and roadway and bridge design. Outreach to local property owners will continue during the design and right-of-way phases of the project.</p>

Letter I7

Godie Gale
4981 Conch Ave
Bodega Bay, CA 94923

August 15, 2015

Oliver Iberien, Branch Chief
Office of Environmental Analysis
CA Department of Transportation District 4
Attn: Brian Gassner
111 Grand Avenue, MS8B
Oakland, CA 94612

RE: Gleason Beach Roadway Realignment Project.

I attended the Public Open House on Wed, July 29, 2015, at the Grange Hall in Bodega Bay.

17-1

I appreciate the opportunity to learn about the project, see what you have accomplished so far, and peruse the EIR draft.

I have lived in Carmet (just south of Serena Del Mar) for five years. Carmet shares our water (spring water) with Serena Del Mar, and Serena Del Mar shares its water (well water) with us. Our neighborhoods practice very strict conservation measures because of the drought and because we do not have public water to hook into if we run out. We do not irrigate, wash our cars, etc.

17-2

Questions: 1. How much water do you estimate using to build this project?

17-3

2. What is the source of your water supply?

17-4

3. How will you protect Scotty Creek and Serena Del Mars wells?

17-5

I strongly request that you not use potable water in building this project.

17-6

In the five years I have lived in Carmet, I have noticed significant erosion on the ocean side shoulder of State Route 1 in four or five places between Carmet Drive and North Salmon Creek Beach. There are less than two feet of earth between the asphalt and the cliff down to the beach. There are no houses to fall off as occurred in the section of your realignment project. However, hundreds of vehicles park on those undermined edges every week. There is, also, tremendous amount of pedestrian traffic on those precarious edges/pathways to the beaches.

17-7

Questions: 1. Do you have plans to reinforce those hazardous areas before you begin this Gleason Beach Project?

2. What will be your route to the project site? From the north through Guerneville, Monte Rio and Duncans Mills? Or from the South through Bodega Bay?

The highway through Bodega Bay is extremely narrow. There is literally no shoulder between private driveways and businesses. Visitors stroll in the highway enjoying the scenic views, taking pictures and generally believing they are in an outdoor mall. It is a popular route for bicyclists.

17-8

Because of the narrow streets and the tremendous bicycle and pedestrian traffic, I strongly recommend you not bring your earth moving equipment, cement trucks, equipment trucks and other heavy machinery through the town of Bodega Bay.

My third concern is rust. Every metal except copper and stainless steel rusts in this environment. In five years, I have lost many possessions due to rust. Wall plugs, chair legs, barbecues, wheelbarrows, shovels, etc. etc.

17-9

I strongly advise you use copper and stainless steel nails, screws, supports, etc., or your new bridge will fall down.

Thank you for this opportunity to share my concerns.

Godie J. Gale (formerly LaFlamme)



Response to Comment Letter I7: Godie Gale

Response I7-1	Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. Your comments are addressed below.
Response I7-2	Estimated water usage during project construction will be calculated as the project design is more fully refined and once all construction activities/quantities have been determined. Water would be delivered to the site by the contractor, similar to other materials needed for the project. The source of water would be determined by the contractor, but non-potable water sources are located in Petaluma, Santa Rosa and Sonoma.
Response I7-3	Water would be delivered to the site by the contractor, similar to other materials needed for the project. The source of water would be determined by the contractor, but non-potable water sources are located in Petaluma, Santa Rosa and Sonoma.
Response I7-4	One of the factors that led to the decision to select Alternative 19A as the Preferred Build Alternative was that in contrast to Alternative 20, Alternative 19A would not negatively affect wells in the project area.
Response I7-5	Water would be delivered to the site by the contractor, similar to other materials needed for the project. The source of water would be determined by the contractor, but non-potable water sources are located in Petaluma, Santa Rosa and Sonoma.
Response I7-6	Caltrans' long-term plan for this area is to protect SR 1 from coastal erosion and to provide continued access between the coastal communities in the area. At this time, Caltrans is not studying the area south of the project site.
Response I7-7	The Gleason Beach Roadway Realignment Project would address the project need identified in the Draft EIR/EA, within the limits of the project area identified in that document.
Response I7-8	The construction vehicle route to the project site would depend on the location where the contractor would source materials and supplies. Any oversize or overweight trucks would require CHP escort and/or advance and trailing vehicles for safety. Final determination about construction staging will be addressed as the project design is further refined.
Response I7-9	The type of metal and other materials to be used for the project will be determined as the design is further refined. Rust is one of the many factors that will be considered.

Impacts of the Highway 1 project on two coastal harbor seal haulouts in Southern Sonoma County

Joseph Mortenson, Ph. D.

A number of coastal harbor seal haulouts in Sonoma County have been monitored for years. The first systematic counts were made in the State Harbor Seal Census, which began with a trial count in 1981. In 1982 and afterward through 1995 annual counts of California harbor seals were made at the time of molt, when the maximum number of seals are expected to be ashore. Later in the 1980s data were collected outside year round by myself in preparation for a book. Starting in 1998 a census during the breeding and later during the molting peak has been conducted by the Point Reyes National Seashore for the central California coast. Data for these haulouts is now also collected year round in a monitoring program by the Stewards of the Coast and Redwoods and the Sonoma County Water Agency.

Two of these Sonoma coast haulouts will be impacted by the Highway 1 construction project. They are called the Rock Point (Figure 1) and Chalanchawi (Figure 2). Rock Point is closest to the center of construction activity. Chalanchawi lies to the north near where the realigned Highway 1 will join the original road. Both of these haulouts have close by pullouts which serve Highway visitors to the coast. Usually few if any cars stop and only sometimes are the harbor seals even noticed, although the haulouts are very close to shore. Most visitors do not disturb the seals, but sometimes alerts or movements by the seals may be seen in response to people. However, loud noises by visitors or sudden appearances made right at the edge of the cliffs can completely flush all seals off some or all of the occupied haulout rocks.

Both haulouts are covered under the Marine Mammal Protection Act. The haulout rocks are included in the California Coastal National Monument and in the Farallones National Marine Sanctuary, and are subject to their regulations. Sites where marine mammals are born receive special consideration by the Office of Protected Resources of NOAA. Nearby work may be suspended when neonatal harbor seals are present, such as at Jenner.

Newborn seals have been seen at both Rock Point and Chalanchawi (e. g. Figure 3). Chalanchawi is in the lee of a west facing sea bluff which moderates wind waves and swell. Because of this Chalanchawi serves in as a nursery area where mothers and pups can be seen in pairs, the pups seeming to ride on their mothers backs (Figure 4).



Figure 1. Rock Point Haulout Rocks Within Red Line



Figure 2. Chalanchawi Haulout Rocks Within Red Line



Figure 3. Newborn pup at Chalanchawi.



Figure 4. Mother and pup swimming in the protected nursery at Chalanchawi.

Recommendation

Both Rock Point and Chalanchawi are sensitive and long studied natural areas. Though the harbor seals at these sites are accustomed to ordinary traffic sounds they will be disturbed if the two nearby parking areas serve as staging sites for equipment for the Highway 1 construction. Therefore I recommend not using the parking areas in this project.

18-1

Response to Comment Letter I8: Joseph Mortenson

Response I8-1

Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County.

The closest harbor seal haul-out site is Rock Point haul-out, as identified by Sonoma County Water Agency and Stewards of the Coast and Redwoods and peripheral monitoring results (2014). Rock Point is approximately 500 feet northwest of the project and offshore. This is well away from the project site, which lies to the south and inland. The Chalanchawi haul-out is located in the Russian River estuary and is not within the Gleason Beach biological study area.

Since the circulation of the Draft EIR/EA, noise analysis has been added to Final EIR/EA with FONSI in Section 2.3.4, Animal Species. No substantial temporary or periodic increase to ambient noise levels is expected in the project vicinity. Construction-related noise and human activity levels may temporarily deter wildlife from the project area but are not expected to affect marine mammals at offshore haul-outs due to their distance from project activities. No permanent increase in visitor usage or visitor related noise is expected to result from the project. A statement has been added in the Final EIR/EA with FONSI in the Affected Environment subsection of Section 2.3.4, Animals, to explain why marine mammals will not be affected by the project.

The majority of project work will be conducted east of existing SR 1 and away from the shoreline. Staging is limited to the project area and does not include the referenced turnout. The haul-outs are outside of the project area and are not expected to be affected by the project.

Tom Roth, 22475 Fort Ross Road, Cazadero, CA 95421

August 22, 2015

Mr. Oliver Iberien, Branch Chief
Office of Environmental Analysis
California Department of Transportation Dist. 4
Attn: Brian Gassner
111 Grand Avenue, MS8B
Oakland, CA 94612
Fax: 510 286-5600
Email: gleasonrealignment@dot.ca.gov

Re: Comments on Gleason Beach Roadway Realignment Project

Dear Mr. Iberien:

19-1 | A longtime resident of Sonoma County’s coastal hills, I am a frequent traveler on Highway 1 and have long enjoyed its views and coastal ambience. I am very familiar with Gleason Beach and its cliff erosion problems and the necessity to relocate a section of the highway in that area. Long term highway safety on Highway 1 near Gleason Beach warrants Caltrans’ examination of possible realignment of the highway. Unfortunately the “build” alternatives proposed for the project are far out of scale for the area.

First, brief comments about the proposed project EIS/EA:

- 19-2 | • A 750-900 foot bridge constructed parallel to Gleason Beach will destroy one of Sonoma County’s most scenic views and will actually decrease access at what is currently one of the most accessible beaches in the area. Gleason Beach is delightfully small and projects an image and the fact of easy accessible recreation for families and children. Even just driving by on the current Highway 1 presents a tableau of fun and relaxation. Constructing concrete bridge of the scale proposed by Caltrans will destroy forever a scenic pleasure that belongs to all of us.
- 19-3 | • Caltrans proposes a boardwalk to Gleason Beach, but it will neither be as inviting as the present roadside access, nor will it be accessible (because of its steepness) to many people with ambulatory disabilities.
- 19-4 | • The parking pad proposed for the “build” alternatives will be designed to accommodate five cars; only one-half to a third of the current roadside parking that will no longer be available.
- 19-5 | • The highway alignment and bridge appears by its size and alignment to be constructed to accommodate large commercial trucks used on interstate routes. This segment of Highway 1 is not intended for large commercial vehicles.
- Speeding on Highway 1 continues to be a significant issue. The straightening out and widening of most of the project segment will only encourage speeders, who will quickly encounter curves and dips in either direction.

- 19-6
 - Daylighting of Scotty Creek is a positive environmental outcome of the “build” alternatives and should be retained no matter what project is selected.
 - The draft EIR/EA does not adequately address mitigation the project’s effects on fragile local water supplies or on sensitive wetlands, coastal prairies or rare habitat for the federally listed Myrtle’s silverspot butterfly or the red legged frog. For the most part, mitigation measures are left to the preparation of future reports or adherence to Caltrans guidelines. Such “mitigation” cannot be determined by the informed reader to be adequate or inadequate. Additionally, funding for wetland enhancement to make up for loss of wetlands is speculative and relies on the good will and availability of funds from private sources and/or California State Parks. The EIR/EA contains no commitment from Caltrans to fund habitat replacement and enhancement.
- 19-7
 - Mitigation for loss of habitat for the Myrtle’s silverspot butterfly is woefully inadequate with a “minimum” replacement ratio of 1:1. Given the uncertainty of successfully enhancing habitat, especially in a fragile coastal zone, replacing established breeding and foraging habitat for an endangered species should be much higher.

Secondly, Caltrans has unfortunately not provided the public with the input it is entitled to by:

- 19-8
 - Substituting an informational meeting for a proper hearing for the draft EIR/EA. Public input at the meeting was not recorded by Caltrans. This is especially disturbing since the draft EIR/EA clearly states that input at the meeting would be considered in the preparation of the final EIR/EA.
 - Not adequately addressing Sonoma County’s Local Coastal Plan, which has designated the project area as within a scenic resource area. While the LCP focuses mainly on development effects on scenic resources, it is obvious that highway projects affect scenic resources. Caltrans admits that the “build” alternatives do not conform to the LCP. Caltrans’ inattention to the LCP process needs to be redressed.
 - An outdated and incorrect mailing list for public officials limits the comments of many of the area’s representatives. The mailing list in the draft EIR/EA contained two officials who do not represent the area, one who no longer holds state office, and another who is no longer a county supervisor. Additionally, the list does not include either the former or current state Senator who represents the area.

19-9 I find it entirely possible that Caltrans could construct a properly scaled project that would preserve the scenic, agricultural, archeological, recreational and natural values of the area. But first, Caltrans must take a step back and conduct an adequate public process. Thank you for your attention to this important matter.

Sincerely,

Tom Roth

Response to Comment Letter I9: Tom Roth

Response I9-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual resources within the project area. Various environmental considerations, including visual resources impacts, were evaluated to achieve a balance between multiple environmental resources. As a result of environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative that best balances potential impacts to multiple environmental resources.</p>
Response I9-2	<p>In addition to constraints associated with visual quality, other environmental constraints related to the project design included the need to: 1) avoid the projected year 2100 erosion line along the coastal bluffs; 2) minimize impacts to the Scotty Creek floodplain; 3) continue to provide access to existing property owners; and 4) withstand storm surges and increased flooding at elevation. Over 20 project design alternatives/variations were evaluated as part of the project identification process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still complying with Caltrans design standards and constraints.</p>
Response I9-3	<p>The location of the proposed boardwalk is the only State-owned parcel that would provide beach access within the project area, and therefore the only feasible location option for the project to provide beach access. South of Scotty Creek, there are no public parcels and so beach access cannot be proposed at these locations. The Draft EIR/EA disclosed that the boardwalk would result in an adverse effect and significant and unavoidable impact relative to aesthetics and visual quality. The existing topography of the bluff presents design limitations relative to the type and scale of the structure. This feature will be further refined during the CDP process.</p>
Response I9-4	<p>Implementation of Alternative 19A, including removal of the Scotty Creek culverts, would result in the loss of about 12 informal parking spaces located along existing SR 1. This loss of parking would be offset by construction of a parking pad north of Scotty Creek that would accommodate 12 vehicles.</p> <p>South of Scotty Creek, the existing shoulders and informal parking areas would remain as-is. To address existing (and future) parking/traffic concerns, coordination between Caltrans and the Sonoma County Sheriff's Department, California State Parks and California Highway Patrol will be required.</p>
Response I9-5	<p>The design focus of the proposed SR 1 alignment is not intended for vehicular access of large commercial vehicles. In addition to providing access to motor vehicles, the dimensions of the new SR 1 would provide improved access to bicyclists and pedestrians in the project area via the use of the proposed new SR 1 roadway shoulders. Since the circulation of the Draft EIR/EA, the dimensions of the elevated bridge as described in the Draft EIR/EA for Alternative 19A have been modified in the Final EIR/EA with FONSI to be planned as 49 feet wide with a 6- to 8-foot shoulder and 6-foot sidewalk in the southbound direction and a 6- to 8-foot shoulder in the northbound direction. These shoulder dimensions would be much wider than shoulders along existing SR 1 and would better allow for multimodal use of the project corridor compared to existing conditions.</p> <p>In terms of vehicle speeding and passing illegally, this is a concern for the entirety of SR 1 and cannot be addressed by the proposed project alone. On the proposed new SR 1 bridge, the horizontal and vertical curvature of the roadway is designed for a maximum design speed of 50 mph, with the bridge and southern portion of the alignment designed for a speed of 40 mph. This curvature would help reduce overall travel speeds on the bridge, but ultimately cannot completely prevent high speed driving. However, as the project's design is further refined, traffic calming techniques such as the installation of bumps, warning signage, flashers and/or striping can be explored in order to reduce travel speeds.</p>
Response I9-6	<p>Caltrans recognizes the potential value in improving streambed conditions for salmonids and is considering opportunities to improve Scotty Creek as part of project-related mitigation or enhancement activities. This opportunity will be evaluated further as part of the project permitting phase that follows the environmental document.</p>
Response I9-7	<p>The proposed project has been designed to avoid impacts to wetlands as much as possible by designing an elevated structure over much of the wetland area. Caltrans is working to minimize project-related impacts to sensitive environmental resources. Avoidance, minimization, and/or mitigation measures will be further refined in the permitting stage of the project. Caltrans would comply with the Clean Water Act and other relevant environmental permits.</p>

Response I9-8

The July 29, 2015 public open house provided the public an opportunity to obtain information about the project, review project details, ask questions of Caltrans staff, and provide written comments on the Draft EIR/EA. An announcement was made at that meeting that only written comments, such as on comment cards provided at the meeting, via email, or via regular mail, would be recorded and responded to. As required under CEQA, Caltrans collected all comments received via those written mediums and has providing written responses to them in this Final EIR/EA with FONSI document.

The Draft EIR/EA acknowledges that the proposed project would be inconsistent with the Sonoma County LCP, including as related to the project's expected impact on visual resources in the project area.

Caltrans used the U.S. Post Office's Every Door Direct Mail program to mail approximately 3,544 notices within a 5-mile radius of Bodega Bay, to post office boxes and rural routes in Bodega, Bodega Bay, Duncans Mills, Jenner, and Occidental, and post office boxes in Monte Rio. The intention was to reach all residents and businesses in the selected areas; an elected official with an office or residence in the selected area would also receive notice.

Response I9-9

Caltrans is committed to public outreach and throughout the environmental review process, Caltrans has adhered to all CEQA/NEPA requirements pertaining to facilitation of public participation. In addition to holding a scoping meeting at the outset of the environmental review process, Caltrans also conducted a public open house during the Draft EIR/EA's 45-day public review period. The public open house was publicized via a notice published in the *Santa Rosa Press Democrat*, online at bodegabay.com, and a mailer sent through the U.S. Post Office to approximately 3,544 residents and businesses for post offices and rural routes within a 5-mile radius of Bodega Bay, in Bodega Bay, Bodega, Duncans Mills, Jenner, Monte Rio, and Occidental. Caltrans personnel visited various community locations in advance of the public meeting and left hard copies of the Draft EIR/EA at U.S. Post Offices in Occidental, Bodega Bay and Jenner. The Draft EIR/EA was also left at the Occidental Public Library, Central Santa Rosa Library, and Guerneville Regional Library.

NORMA L JELLISON

◆◆◆
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August 22, 2015

Mr. Oliver Iberien, Branch Chief
Office of Environmental Analysis
California Department of transportation District 4
111 Grand Avenue MS8B
Oakland CA 94612
BY EMAIL:gleasonrealignment@dot.ca.gov

RE: Comments on Draft EIR/EA on proposed Gleason Beach Road Realignment Project
Highway 1, Sonoma County

Dear Mr Iberien:

I must first note my objection to the lack of a Public Hearing on the Draft EIR/EA in compliance with both CEQA and NEPA.

The July 29, 2015 "Open House Public Question/Answer Panel for the Draft EIR/EA" was appreciated as the SOLE opportunity for local residents and interested parties to see project elements portrayed on large display boards and ask questions and provide comments. However, I was taken aback by introductory comments that public comments made and questions raised at that open house were not being recorded, nor would they constitute comments on the draft EIR/EA and that only written comments received by Caltrans would be considered part and responded to as part of the public record. I do not find this in keeping with the spirit or letter of CEQA and NEPA Guidelines.

This was a well attended meeting. The citizens who turned out that evening fully expected to be able to express and have their comments recorded, become part of the public record, and taken into account as part of the process of review and comment on the Draft EIR/EA and addressed in any subsequent Response to Comments on the Draft EIR/EA. To be denied that opportunity and told that the only way their comments would be considered was by writing and sending them to Caltrans by US Mail, fax or EM shocked the attendees. It gave the impression that public comments were a waste of time and breath, as nothing that was said that night mattered in the environmental process, since no record was being made of the comments. In my opinion, this is counter to the purpose and intent of the CEQA/NEPA process which calls for full public participation and opportunities for public comment.

I10-1

Local Coastal Plan Amendment Required

I10-2

This Project will require an Amendment to the Sonoma County Local Coastal Plan to proceed. This in and of itself requires a Public Hearing. This requirement and for the reasons to follow and those cited above - that the July 29, 2015 meeting did not constitute a Public Hearing, that the lack of recording of the public comments made that night was an affront to the citizens of Bodega Bay and environs who took their time (unpaid as Caltrans staff and multiple consultants in attendance were) to attend - lead to the request that Caltrans revise and re-circulate the Draft EIR/EA and hold the requisite Public Hearing and record public comments made.

Significant Adverse Unmitigated Visual Impacts to the Sonoma Coast

I10-3

The Proposed Project will result in major adverse impacts to the County of Sonoma Designated Scenic Resource Area SubArea 8/Pacific View/Willow Creek map segment shown in Figure C-OSRC-1h of the Sonoma County Local Coastal Plan.

Virtually every one of the Proposed Project Alternatives that remain under consideration by Caltrans for the proposed Gleason Beach Roadway Realignment Project, save the "No Project" alternative, will result in major adverse unmitigatable impacts.

Caltrans' "Visual Impacts Study" was not provided to the public nor noted as to availability in the public meeting notice. Caltrans failure to circulate and solicit comments on the Visual Impacts Study, and the agency's failure to make this document readily available to the public in timely fashion, contribute to a flawed disclosure of the impacts of the Proposed Project to the delicate ecosystem and visual ambience of the Scotty Creek watershed, a favorite attraction with visitors to the Sonoma Coast often found in tourism guides.

I10-4

Only because one local resident requested and received the study was it circulated among interested citizens in the Project area. Locals who constantly travel this highway as their main access to services and/or employment will be most impacted by the deteriorated visual character of this stretch of the iconic scenic Route One through Sonoma County.

It is unacceptable that the Visual Impacts Study was only available to interested parties living on the Sonoma Coast as of receipt by the local citizen on August 19, 2015, just four days before close of comments on the Proposed Project. The fact that hardcopies or CD-ROMs of the Visual Impacts Study were not available, that the Visual Impacts Study was not accessible online, and that members of the public with an interest in this document had to fill out a specific written request for a copy of it on one of the Caltrans "Comments" cards provided at the public meeting on July 29 at the Bodega Bay Grange Hall is not compliant with ease of public access and full availability of information needed to fully evaluate impacts of the Proposed Project. This demand for written request is essentially making a request under FOIA, something that should not be a condition of public access to information associated with the preparation of an environmental analysis.

I10-4
(cont'd)

Section 30251, Scenic and Visual Qualities of the California Coastal Act, states that "(T)he 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."

The display boards at the open house public meeting did not include any images of scale measuring from mean high tide line to the border of the Gleason/Mann/Ballard Ranch (East to West). Those who could not attend the meeting to see the display boards or did not have an opportunity to review or the time to do so, given the untimely receipt and lack of public distribution of the Visual Impacts Study are at a loss to understand the extent of impacts that will occur to the scenic qualities of Route One in the project area.

The loss to the public of the picturesque Scotty Creek scenic landscape unit beneath an industrial-scale concrete bridge more appropriate to an urban cityscape freeway overpass does not comply with the cited provision of the California Coastal Act. This loss is a major adverse unmitigatable impact of the Proposed Project and should not be taken lightly by Project proponents. A more graceful structure should be designed, at a lower and less-intrusive elevation, and a more visually-transparent highway railing design should be incorporated in any final design that goes forward.

The scale of the Proposed Project in the context of this sensitive site and setting is engineering overkill. To introduce such a substantial level of adverse impact in this unique scenic coastal environment, is not compliant with the California Coastal Act, with CEQA and CEQA Guidelines. Nor is it in keeping with NEPA compliance and environmental impact assessment guidelines. An unbiased reconsideration of earlier less-impactful options not fully evaluated, and a redesign of the Proposed Project that might potentially minimize and mitigate the full range of anticipated impacts is mandatory and contributory to the statement that this EIR/EA needs to be re-circulated.

Adverse Impacts to California Coastal National Monument Sites Not Addressed

The EIR/EA is deficient in that it does not identify nor address the existence or potential adverse impacts of the Proposed Project on the California Coastal National Monument as it exists along the Sonoma Coast and specifically in the Project Area.

I10-5

The California Coastal National Monument (CCNM) is located along the entire 1100 mile coastline of California. Created in 2000 by Presidential proclamation under the Antiquities Act and expanded in 2014, the CCNM protects over 20,000 rocks, islands, islets, pinnacles and reefs above mean high tide within 12 nautical miles of the shoreline. The CCNM Planning Area encompasses the Coastal Zone boundary, as defined by the CA Coastal Commission.

- I10-5 (cont'd) One of the Gateways to the CCNM, under the Bureau of Land Management of the Department of the Interior, is the Sonoma Coast (Bodega Bay to Gualala). These Gateways serve as focal points and visitor contact information for the Monument. The focus is on principles of geotourism: *"tourism that sustains or enhances the geographical character of a place, including its environment, culture, aesthetics, heritage and the well-being of its residents."* The CCNM supports organized local stewardship for coastline regions.
- I10-6 BLM has partnered with the Stewards of the Coast and Redwoods, a cooperating association of the CA State Parks Sonoma Coast Russian River Division, along with the Seabird Protection Network and Madrone Audubon. One of the partnership activities involves a citizen science program, monitoring several rocks along the southerly Sonoma Coast (another program is in place at Sea Ranch on the northern Sonoma Coast).
- I10-7 This monitoring is associated with pelagic birds/seabirds and marine mammals on offshore rock islands of the Sonoma Coast. One of the seabird monitoring locations is the rocks off the Gleason Beach area - the Proposed Project area. Using protocol documentation Stewards citizen scientists have monitored these rocks, part of CCNM Units 14 and 15, since 2013 as seabird rookeries and resting areas. These rocks are also monitored as Harbor Seal haul outs. These rocks have been monitored as a Harbor Seal haul out for over twenty years as part of the Sonoma Coast Harbor Seal population study coordinated by the Pt Reyes National Seashore (National Park Service, DOI).
- I10-8 Both pelagic birds and marine mammals are sensitive to noise and human disturbance. While such disturbances are acute during nesting and chick rearing for seabirds, they routinely impact colonies that use offshore rocks for resting and haul out purposes. Noise and human disturbances have significant impacts on reproduction of these species and on their needs for daily metabolic functions.
- I10-9 Clearly, construction activity adjacent to these rocks, use of turnouts for parking and turn around of construction equipment particularly, although not exclusively, at the northern terminus of the re-alignment and its connection back to the existing road alignment, and the adjustments to beach activity promoted by realignment and reconstruction all will likely have significant negative adverse impacts on the CCNM inhabitants.
- I10-10 I believe the deficiency of the EIR/EA in assessing impacts on the CCNM requires the document to be revised and re-circulated. Further the impacts on the visual character of the CCNM add to the deficiency of the assessment of visual impacts of the Proposed Project.
- Purpose of the Project Deficiency**
- I10-10 Caltrans' bases the need for this Proposed Project on impacts of climate based sea level rise and road failures so associated. First, the project need cannot be justified based on an assertion that sea level rise is responsible for the rapid decomposition of cliff geology in this area. This assertion has been convincingly debunked by both Caltrans' consultants

- I10-10 (cont'd) and by observations of long time local residents, some of whom are geologists and/or knowledgeable professionals.
- I10-10 (cont'd) It is obvious that a very narrow cliff side agricultural property was unwisely allowed to be subdivided for homes years ago. This occurred despite compelling evidence, at the time that the subdivision was approved, that the geologically-unstable area where the residential lots would be created could be expected to quickly erode. This erosion is associated with the flow of a perched water table that exits on the cliff face and adjacency part of the way between the elevation of the highway and the current mean high tide sea level. It is primarily the flow of water from these springs on the cliff side, combined with surface sheet flow/runoff, that provides the major contribution to cliff erosion that has threatened these homes literally from inception of construction and now threatens those remaining adjacent homes and limited linear segments of the highway itself.
- I10-11 The Proposed Project as designed, therefore, cannot logically be characterized as necessary due to sea level rise. The draft EIR/EA, in addition, makes no mention of the probable contribution of new stormwater runoff from the extensive additional impervious surfaces of, and drainage from, the Proposed Project, which are expected to be added to the present runoff from existing highway surfaces in this region.
- I10-12 A main contributory to the north/south extent of the Proposed Project (between 3000 feet and 3700 feet) in large part is the neighborhood septic leach field that was allowed to be constructed on the east side of Highway One. Clearly, the over engineered Proposed Project has become much longer and moved much further in land than would otherwise have been necessary.
- I10-13 An additional alternative in Caltrans' Proposed Project EIR/EA should be proposed and fully evaluated that would enable a shorter and less invasive bypass route. Rather than have a leach field substantially drive the re-alignment of the highway so far inland with so many significant adverse unmitigatable impacts, relocate the leach field inland! It is noted that the leach field now serves a much smaller number of houses (and could be downsized as well), due to the subsequent removal of some of the destabilized residences it was installed to serve.
- I10-14 The aforementioned facts are further reasons that the EIR/EA should be revised and re-circulated. Simply put, a Proposed Project is not adequately identified and assessed to support a selection of a Preferred Alternative.
- I10-15 **Wetlands, Sensitive Habitant and Species of Concern Inadequately Assessed**
- I10-15 Other comments address these topics in greater detail. I add my comments that the Scotty Creek watershed comprises an Environmentally Sensitive Habitat Area (ESHA) under the definition of the CA Coastal Act and the Coastal Commission.
- I10-15 Sensitive wetlands, which provide critical habitat for unique species and that are subject to the provisions of the federal Clean Water Act, are not addressed adequately in the

- 110-15 (cont'd) | EIR/EA for the Proposed Project, and prior efforts by affected landowners and local environmental and science groups who pursued restoration of salmonid habitat in Scotty Creek appears to have been overlooked. Scotty Creek was the site of a Salmon Habitat Restoration Project, under the auspices of UC Sea Grant Cooperative Extension Program and in coordination with Fish and Game (now Wildlife) and Bodega Marine Lab, whereby fencing was installed for the specific purpose of managing access an restoring salmonid habitat. Clearly Scotty Creek possesses salmonid habitat.
- 110-16 | In addition to the above example, statements that no salmonid habitat exists nearby also ignore the 2006 Cheney Gulch Stream Inventory Report prepared by the CA Department of Fish and Game (Wildlife) establishing that Cheney Gulch Watershed constitutes salmonid habitat.
- 110-17 | Gleason Beach and the surrounding wetlands area upstream clearly comprise what the Sonoma County Local Coastal Program (LCP) refers to as Environmentally Sensitive Habitat Area (ESHA) for other species. The Proposed Project will impose permanent adverse impacts to the Coastal Prairie ESHA at this location. The wetlands that would be impacted by the proposed realignment project at Gleason's Beach represent some of the only remaining native habitat in that category on the Sonoma Coast, thus the requisite Corps of Engineers wetland permitting protocols involving full compliance with the federal Clean Water Act (CWA) should be observed by Caltrans.
- 110-18 | The remaining historic ranch house has been well maintained and the associated agricultural accoutrements along Scotty Creek represent a culturally important landmark on the Sonoma Coast, one which should not be casually sacrificed to simply disappearing below an overbuilt bridge project. The loss of this agricultural heritage site would then hypothetically be "mitigated" by a future Caltrans brochure as has been proposed by the Agency. This is inadequate mitigation for such a significant loss.
- 110-19 | Likewise, tentative mitigations discussed by Caltrans for permanent loss of the Myrtle's Silverspot butterfly habitat (of which only four populations are known to remain in California) and for damage by the Proposed Project to the California red-legged frog and its habitats are inadequate and need to be more fully delineated.
- 110-20 | Measures should be taken to ensure the least adverse impact and interference from construction on these species. Of particular concern is the impact of conversion of habita impacting the Myrtle's Silverspot Butterfly. The flight season of this rare butterfly is June-September, coinciding with peak construction periods. The life cycle of this species must be taken into consideration, including pre-construction surveys for larvae on Western Dog Violet host plants. Western Dog Violet is not listed as a special-status plant although its importance as the host plant to the endangered Myrtle Silverspot Butterfly argues that it should be given more focus and a higher importance in the EIR/EA. Further, merely committing to fund habitat enhancements elsewhere along the Sonoma Coast is inadequate to compensate for taking habitat of an endangered species when only 4 populations are known to remain in California. This argues for much more robust analysis and mitigation measures.

110-21

Adding to this list of inadequately addressed species and habitat, many of the seabirds that use the previously described CCNM rocks are protected under the Migratory Bird Act and some are rare, threatened or endangered species, thus are an important part of the sensitive and biologically rich coastal environment which is likely to be adversely impacted by this project and have not adequately assessed.

The above are more examples of the assertion that the EIR/EA is deficient and should be revised and re-circulated.

Inadequate Cultural Resources Analysis

Caltrans indicated Cultural resource studies within the Project Area include completion of an archaeological inventory (Caltrans 2012d), an inventory of the built-environment (Caltrans 2012e), and a subsurface testing/NRHP eligibility study (Caltrans 2014h). These documents were not adequately circulated for public review. It is acknowledged that Caltrans 2012d was likely not circulated in order to better protect archeological sites from illegal pothunters and vandals, some degree of appropriate professional peer-review should have been conducted. Caltrans also claims to have prepared a summary document providing an overview of methods and findings regarding cultural resources for this project (Caltrans 2014e). A draft report, "Historic Resources Inventory and Evaluation Report, Scotty Creek Restoration, Gold Ridge Resource Conservation District Sonoma County California," was apparently prepared by JRP Historical Consulting in April 2011, and was supposed to have included the initial NRHP evaluation of the Gleason-Mann-Ballard Ranch that was used in the inventory of built environment resources for this Proposed Project. No final version of this report has been made available to the public. This document and the protocols for this research have not been circulated for public review.

110-22

A records search was reported to have been conducted on October 19, 2009, at the Northwest Information Center of the California Historical Resources Information System (File #09 0473), housed at Sonoma State University, Rohnert Park. The records search is claimed to have included a review of all known cultural resources records and reports within 0.5 mile of the Project Area, and although the Scotty Creek area was obviously a place of reverence and habitation for native peoples, not all of these uses are necessarily documented within the Northwest Information Center of the California Historical Resources Information System database.

While results of the records search indicated that some site-specific archaeological studies have been conducted in the Proposed Project area, the Draft EIR/EA for the Proposed Project fails to verify the document's claim of an adequate and representative inventory. In light of the nature of the sheltered valley along Scotty Creek, it seems improbable that only 4-5 archeological properties were located there, as claimed by Caltrans. There were likely a greater number of sites along Scotty Creek than those documented thus far.

- I10-22 (cont'd) Although Caltrans asserts, in the Draft EIR/EA, that a reasonable and good faith effort has been made to identify any members of the local Native American community who may attach religious or cultural significance to the Proposed Project area, more onsite research should be done now that the preferred alternative routes have been more narrowly identified.
- A representative of the Native American community at the public meeting indicated a lack of contact. A separate consultation is required with Native American cultures and it is incumbent on Caltrans to proceed timely to consult and coordinate and protect cultural resources as required by law.
- Noncompliant Section 4(f) De Minimis Determination for the Project:**
- I10-23 A flawed Section 4(f) Evaluation document has been prepared in tandem with the Gleason Beach State Route (SR) 1 Roadway Realignment Project Draft Environmental Document (DED). This document purports to provide, but fails to submit, documentation necessary to support determinations required to comply with the provision of 23 United States Code (U.S.C.) 138 and 49 U.S.C. 303, commonly referred to as Section 4(f).
- The environmental review, consultation, and any other action required in accordance with applicable federal laws for this project is claimed to have been carried out by Caltrans under its assumption of responsibility pursuant to 23 U.S.C. 327. This documentation has not been prepared in accordance with legislation established under the United States Department of Transportation Act of 1966 (49 U.S.C. 303; 23 U.S.C. 138).
- Summary Conclusion**
- I10-24 The proposed 750-900 foot elevated concrete bridge, bypass approaches, and abutments and engineered concrete supports currently being contemplated by Caltrans are of a scale that is unnecessary and seriously out of character with the Sonoma Coast. The analysis of the EIR/EA is deficient in many respects as outlined in comments above.
- I10-25 This proposed project needs to be approached with more sensitivity to the unique values of the site. As argued above, the EIR/EA needs to be revised and re-circulated, including conducting a more robust public participation process. Without this, Caltrans' Proposed Project would unintentionally destroy an important vestige of Sonoma County's agricultural and cultural history, obscure spectacular coastal viewsheds, unnecessarily complicate an important beach access point not presently requiring transit of a cliff face trail, and irrevocably wipe out ecological and habitat values of significance to the State of California and the public.
- I10-26 It is clear that whatever decision Caltrans may make about how best the Agency should proceed with any type of repair or realignment project at Gleason's Beach will need to be fully informed and guided by the environmental sensitivity, historical significance, archeological resources, riparian setting, wildlife values, and other unique site-specific

I10-26
(cont'd)

factors that pertain to this particular location. The Draft EIR/EA, unfortunately fails to accomplish this balancing act. I again submit that nothing short of a revision and re-circulation of the EIR/EA will begin to accomplish that.

Sincerely,

Norma Jellison

Norma Jellison
Resident of Bodega Bay

c: Supervisor Efren Carrillo, Fifth District Sonoma County
Senator Mike McGuire Attn: Jason Liles, Chief of Staff
Congressman Jared Huffman
Sonoma Coast Chapter Surfrider Foundation
Madrone Audubon Conservation Chair
The Ocean Foundation

Response to Comment Letter I10: Norma Jellison

Response I10-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County.</p> <p>In accordance with CEQA Guidelines Section 15802 and NEPA (42 USC 4321), a project scoping meeting was held in Sonoma County within the county of the proposed project in 2014.</p> <p>A public open house was held on July 29, 2015 to provide the public an opportunity to obtain information about the project, review project details, ask questions of Caltrans staff, and provide written comments on the Draft EIR/EA. The meeting was announced in the Notice of Availability (NOA) that was mailed to the State Clearinghouse on July 10, 2015. The NOA was also published in the Santa Rosa Press Democrat newspaper.</p> <p>The July 29, 2015 public open house provided the public an opportunity to provide written comments on the Draft EIR/EA. An announcement was made at that meeting that only written comments, such as on comment cards provided at the meeting, via email, or via regular mail, would be recorded and responded to. As required under CEQA, Caltrans collected all comments received via those written mediums and has provided written responses to them in the Final EIR/EA with FONSI document. Caltrans will continue to provide additional public outreach for the project and conducted a meeting on April 12, 2016 to provide the community with a project update.</p>
Response I10-2	<p>Caltrans is coordinating with the Coastal Commission and Sonoma County to determine the appropriate Coastal Development Permit review and what steps are needed to be consistent with the Local Coastal Plan. A hearing will likely be held as part of the CDP and LCP amendment review as deemed necessary by the reviewing agency. The July 29, 2015 public open house provided the public an opportunity to provide written comments on the Draft EIR/EA. As required under CEQA, Caltrans collected all comments received via those written mediums and has provided written responses to them in the Final EIR/EA with FONSI document. Caltrans will provide additional public outreach for the project to provide an update on the project.</p>
Response I10-3	<p>The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual resources within the project area. Various environmental considerations, including visual resources impacts, were evaluated to achieve a balance between multiple environmental resources. As a result of environmental analysis and public input, Alternative 19A was identified as the Preferred Build Alternative that best balances potential impacts to multiple environmental resources.</p>
Response I10-4	<p>The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual resources within the project area. Various environmental considerations, including visual resources impacts, were evaluated to achieve a balance between multiple environmental resources. The Preferred Build Alternative, Alternative 19A, best balances potential impacts to multiple environmental resources. As the project design moves forward for preferred Build Alternative 19A, efforts will be made to address concerns related to the size and design of the proposed structure.</p> <p>The Visual Impact Assessment is a technical report used as the basis for the visual resources analysis presented in the Draft EIR/EA. As such, public circulation of the Visual Impact Assessment is not required under CEQA/NEPA. However, that report and other technical reports prepared for the Draft EIR/EA were made available to the public upon request at Caltrans' Oakland office.</p> <p>One of the goals of the bridge design is to make the structure as visually thin, light and streamlined as possible, with a curving alignment that blends into the local geography. The project also calls for the development of such design refinements during the project design phase, and it is Caltrans' intent to design the proposed bridge to be compatible with the landscape as much as possible (see Mitigation Measure VISUAL-2: Bridge Design Enhancement Measures). The bridge design will be further refined in the design phase of the project.</p> <p>In addition to constraints associated with visual quality, other environmental constraints related to the project design included the need to: 1) avoid the projected year 2100 erosion line along the coastal bluffs; 2) minimize impacts to the Scotty Creek floodplain; 3) continue to provide access to existing property owners; and 4) avoid future storm event flood elevations. Over 20 project design alternatives/variations were evaluated as part of the project identification process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still complying with Caltrans design standards and constraints.</p>

- Response I10-5 Since the circulation of the Draft EIR/EA, the Final EIR/EA with FONSI has been revised to identify the California Coastal National Monument (CCNM), which is located along the entire 1,100-mile coastline of California. The CCNM is located off the coast from the project area. Since the project will not have activities located within the coastal waters westward of the SR 1 realignment area, no significant/adverse impacts are anticipated to the CCNM. In terms of affecting the relationship between the CCNM and the project area, the project would not result in a significant impact, but would instead preserve the opportunity for visitors to reach the CCNM. In the event that the project isn't implemented and the existing SR 1 roadway erodes and limits access, it would be more difficult for visitors to enjoy the CCNM due to inadequate connectivity of SR 1.
- Response I10-6 Since the circulation of the Draft EIR/EA, the Final EIR/EA with FONSI has been revised to address offshore bird and marine mammal resources which fall outside of the project area and anticipated impact area. This discussion is covered in Section 2.3.4.
- Response I10-7 No impacts are expected to marine mammals and pelagic birds, as there will be no offshore work and minimal construction near or along the coast. Staging will be located along the proposed realignment.
- A bioacoustics assessment was conducted to provide more accurate noise estimates and to compare that with noise thresholds for these species. Marine mammals and pelagic birds or seabirds utilize some of the offshore rocks along portions of the Gleason Beach Roadway Realignment Project. Although relatively close to the highway, these rocks are subject mostly to noise from the ocean waves. Construction activities would not cause noise that would affect these animals. The operation of the roadway would continue to have no acoustic effect on these animals (Illingworth and Rodkin 2016).
- The closest activities to the coast are the removal of the box culverts at Scotty Creek and the stairway construction. These activities would not affect hauled-out seals since they would be over 3,000 feet away. The closest offshore rock outcroppings are 500 feet away. Assuming no shielding from terrain, the predicted sound levels from the maximum noise generating activities would be 70 dBA, a level similar to the ocean-generated sounds and well below National Marine Fisheries Service identified thresholds for harassment of marine mammals.
- Response I10-8 Since the circulation of the Draft EIR/EA, the Final EIR/EA with FONSI has been revised to identify the CCNM, which is located along the entire 1,100-mile coastline of California. The CCNM is located off the coast from the project area. Since the project will not have activities located within the coastal waters westward of the SR 1 realignment area, no significant/adverse impacts are anticipated to the CCNM.
- No project-related noise effects are expected to pinnipeds or seabirds (Illingworth and Rodkin 2016). The turnout closest to the haul-out site is not proposed for use as staging nor otherwise included in the project footprint. Project activities would not occur within close proximity to the harbor seal haul-out or seabirds. The closest project activities would be located over 3,000 feet from the haul-out site and seabirds are not expected to be deterred by project activities. The project is not expected to cause increased human use of the beaches in or adjacent to the project area.
- Response I10-9 The Draft EIR/EA acknowledged that the proposed project will have adverse and unavoidable impacts to the visual and scenic quality of the project vicinity. This includes views toward the Pacific Ocean. However, the project will not adversely affect or destroy the scenic resources of the CCNM.
- Response I10-10 The Draft EIR/EA does not state that sea level rise is the primary cause of bluff erosion (see Section 3.2.6, Climate Change). The analysis of the bluff retreat included other contributing factors in addition to wave action, such as groundwater, surface water runoff, and earthquakes. The bluff retreat analysis also incorporated an increase in the wave action component due to future SLR. Wave action was assumed to contribute 25 percent of the total erosion, based on the geomorphic observations and all available information. More information regarding the causes of erosion can be found in the project's erosion study (*Coastal Erosion Analysis at Gleason Beach*, by WRECO, dated February 2014), in particular, Section 4.1.

Response I10-11	The Draft EIR/EA included a discussion of increased impervious areas as a result of the proposed project. For Alternative 19A the increase in impervious area would be a net of 3.5 acres, which is considered insignificant compared to the size of the existing watershed area (a contribution of 0.12%). See Table 2-13, Proposed Project Added Impervious Areas. The minor increase in surface water runoff resulting from the project will be captured and redirected via ditches and culverts adjacent to the roadway and a down drain system that is intended to alter natural drainage patterns in order to slow the pace of erosion. All drainage of surface water runoff will be directed to Scotty Creek or the ocean. The result of these drainage improvements would have no adverse effect on existing drainage patterns in the project vicinity. More information regarding the causes of erosion can be found in the project's erosion study (<i>Coastal Erosion Analysis at Gleason Beach</i> , by WRECO, dated February 2014), in particular, Section 4.1.
Responses I10-12 and I10-13	One of the goals of the project design is to avoid the projected year 2100 erosion line along the coastal bluff. This constraint requires placement of the proposed SR 1 alignment further inland, preventing a shorter bypass route through the leach field. The leach field falls within the 2100 coastal erosion line and thus the realigned roadway cannot be built over it.
Response I10-14	Your comment has been noted. The responses to public comments provided in this section of the Final EIR/EA with FONSI have elaborated on the information provided in the Draft EIR/EA in order to provide the public information about the purpose and need of the project as well as its potential environmental impacts.
Response I10-15	The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. The proposed project has been designed to avoid impacts to wetlands as much as possible by designing an elevated structure over much of the wetland area. Caltrans is working to minimize project-related impacts to sensitive environmental resources. Avoidance, minimization, and/or mitigation measures will be further refined in the permitting stage of the project. Caltrans would comply with the Clean Water Act and other relevant environmental permits.
Response I10-16	The Final EIR/EA with FONSI states that coho have been identified at Scotty Creek and have the potential to occur within the project area and that salmon have been observed in the greater Salmon Creek watershed approximately 2 miles away. The affected environment discussion reflects technical assistance provided by NMFS and CDFW as well as data available on BIOS and CNDDDB.
Response I10-17	The proposed project has been designed to avoid impacts to wetlands as much as possible by designing an elevated structure over much of the wetland area. Caltrans is working to minimize project-related impacts to sensitive environmental resources. Avoidance, minimization, and/or mitigation measures will be further refined in the permitting stage of the project. Caltrans would comply with the Clean Water Act and other relevant environmental permits.
Response I10-18	<p>The Draft EIR/EA acknowledges that the impact posed by the SR 1 bridge on the Gleason-Mann-Ballard Ranch would be adverse and unavoidable, and that mitigation measures would be implemented, though they would not reduce this significant impact to a less-than-significant level.</p> <p>As described in Mitigation Measure CUL-5: CEQA-Specific Mitigation –Interpretive Signage, Caltrans is committed to working with stakeholders and further details will be addressed during the design phase of the project.</p>
Response I10-19	Mitigation to Myrtle's silverspot butterfly and minimization measures for the California red-legged frog have been revised to reflect USFWS's Biological Opinion (USFWS 2016b) and adequately address the impacts to and commensurate mitigation for MSB. Mitigation details will be determined during the permitting process of the project phase. The avoidance, minimization, and/or mitigation measures presented in Section 2.3.5, Threatened and Endangered Species, of the EIR/EA have been updated with this guidance.
Response I10-20	Caltrans has been consulting with a qualified entomologist in developing the avoidance, minimization, and/or mitigation measures for MSB. These measures have been revised to reflect USFWS's Biological Opinion (USFWS 2016b), and will be further refined during the permitting stage of the project. Construction during the MSB flight season cannot be avoided due to work windows relating to other sensitive species and habitats and the duration of the project. Preconstruction survey for MSB and larvae are identified in Measure BIO-7.

Response I10-21

Since the circulation of the Draft EIR/EA, the Final EIR/EA with FONSI has been revised to address offshore resources, such as seabirds and marine mammals that occur outside of the project area and anticipated impact area. This discussion is covered in Section 2.3.4, Animal Species. No substantial temporary or periodic increase to ambient noise levels is expected in the project vicinity. Construction-related noise and human activity levels may temporarily deter wildlife from the project area but are not expected to extend to offshore areas. No impacts are expected to marine mammals and pelagic seabirds, as work will be limited to inland areas that are largely buffered by distance and houses and trees along the shoreline.

The closest activities to the coast are the removal of the culverts at Scotty Creek and the stairway construction. These activities would not affect hauled out seals since they are over 3,000 feet away. The closest offshore rock outcroppings are 500 feet away. Assuming no shielding from terrain, the predicted sound levels from the maximum noise generating activities would be 70 dBA, a level similar to the ocean-generated sounds and well below National Marine Fisheries Service identified thresholds for harassment of marine mammals.

No project-related noise effects are expected to pinnipeds or seabirds (Illingworth and Rodkin 2016).

Response I10-22

All cultural technical studies and summary documents received peer reviews from cultural resource professionals who meet the Secretary of the Interior Standards and are certified as Professionally Qualified Staff under the Section 106 Programmatic Agreement. Identification and evaluation efforts were concurred with by the SHPO.

Archaeological information and technical studies are not released for public review due to the confidential nature of archaeological data and per California Government Code sections 6254.10 and 6254(r); California Code of Regulations Section 15120(d); and Section 304 of the National Historic Preservation Act of 1966.

Also, the draft report, "Historic Resources Inventory and Evaluation Report, Scotty Creek Restoration, Gold Ridge Resource Conservation District Sonoma County California," is not a Caltrans document. It was provided to Caltrans as a professional courtesy when Caltrans was doing research for its report. Caltrans is not responsible for circulating another agency's draft report, nor is it its policy to do so.

While a number of archaeological sites were identified within a half mile of the project area, Caltrans analysis focused on the six sites identified within the project's Area of Potential Effect (APE). Caltrans' Native American consultation with the Federated Indians of Graton Rancheria and the Kashia Band of Pomo Indians of Stewarts Point Rancheria is ongoing. Caltrans regularly updates Tribes on the status of the project and provides them draft copies of all archaeological technical studies for review and comment. Caltrans has received no such separate comment from any representative of the Native American community.

Response I10-23

The environmental review, consultation, and any other action required in accordance with applicable federal laws for this project was carried out by Caltrans under its assumption of responsibility pursuant to 23 USC 327. Documentation has been prepared in accordance with legislation established under the United States Department of Transportation Act of 1966 (49 USC 303; 23 USC 138).

All cultural technical studies and summary documents received peer reviews from cultural resource professionals who meet the Secretary of the Interior Standards and are certified as Professionally Qualified Staff under the Section 106 Programmatic Agreement. Identification and evaluation efforts were concurred with by the SHPO.

Archaeological information and technical studies are not released for public review due to the confidential nature of archaeological data and per California Government Code sections 6254.10 and 6254(r); California Code of Regulations Section 15120(d); and Section 304 of the National Historic Preservation Act of 1966.

Section 4(f) analysis for historic properties is not limited to incorporation of land; the use of a historic site may include the demolition, removal, or disturbance of historic sites as well as impacts such as noise, pollution, and visual intrusions, per 23 C.F.R. § 771.135(p)(4).

Since the circulation of the Draft EIR/EA, Section 4.2.1 of the Section 4(f) analysis in Appendix B has been modified to note that no part of the historic property is being incorporated into a transportation facility and as the primary facades of the historic properties face the ocean there are no indirect visual impacts and therefore no use.

Responses 110-24, 110-25,
and 110-26

The Draft EIR/EA disclosed that the scale and location of the proposed project would result in adverse effects and significant and unavoidable impacts to visual and cultural resources within the project area. One of the goals of the bridge design is to make the structure as visually thin, light and streamlined as possible, with a curving alignment that blends into the local geography. The project also calls for the development of such design refinements during the project design phase, and it is Caltrans' intent to design the proposed bridge to be compatible with the landscape as much as possible (see Mitigation Measure VISUAL-2: Bridge Design Enhancement Measures). The bridge design will be further refined in the design phase of the project.

In addition to constraints associated with visual quality and cultural resources, other environmental constraints related to the project design included the need to: 1) avoid the projected year 2100 erosion line along the coastal bluffs; 2) minimize impacts to the Scotty Creek floodplain; 3) continue to provide access to existing property owners; and 4) avoid future storm event flood elevations. Over 20 project design alternatives/variations were evaluated as part of the project identification process. The three alternatives evaluated in the Draft EIR/EA would result in the lowest level of environmental impacts while still complying with Caltrans design standards and constraints.

From: Dustin Ballard <dballard30@gmail.com>
Sent: Monday, August 10, 2015 7:12 PM
To: Gleason Realignment@DOT
Subject: Comments on Realignment

My name is Dustin Ballard and I have two comments regarding the proposed realignment of HWY 1 at Gleason Beach.

11-1

1) This is an opportunity to restore Scotty Creek. For decades, the culvert that currently exists has inhibited fish migration and contributed to loss of riparian habitat along the creek. This is an opportunity to make that right and restore the creek.

11-2

2) Alternative Route 20 is the least preferable in my opinion because it will have a shorter lifetime with bluff erosion, will destroy the spring of Dennis McAllister, and comes further inland across the wetlands and will have greater impact on views from nearby properties.

Thanks for taking these comments under consideration.

Db

Dustin Ballard, MD, MBE
Medical Director
Marin County EMS

Response to Comment Letter I11: Dustin Ballard

Response I11-1

Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County.

Caltrans recognizes the potential value in improving streambed conditions for salmonids. The proposed project would remove the current box culverts at the mouth of Scotty Creek to make the creek more accessible to salmonids and is expected to have a net benefit on salmonids. Additional enhancements to Scotty Creek will be considered as part of coordination with the relevant permitting agencies during the permitting stage of the project.

Response I11-2

As part of the environmental review process, Caltrans evaluated the project's potential impacts to water resources in the project area. In part due to potential impacts to water wells under Alternative 20, that alternative was eliminated from further consideration to avoid those impacts. As a result of environmental evaluation and public input, Alternative 19A was identified as the Preferred Build Alternative that best balances potential impacts to multiple environmental resources.

From: Robert Wachtel <bob@posthorse.com>
Sent: Monday, August 10, 2015 10:14 PM
To: Gleason Realignment@DOT
Subject: Comments on the Gleason Beach Project

Dear Caltrans

After reviewing some of the documentation for the Gleason Beach Roadway project and attending the meeting on July 29, I have come up with some considerations set forth in this email.

I12-1

First I want to mention that my family and I have been enjoying that beach for more than forty years. Mentioning that is not for some kind of sentimental appeal, but rather to indicate that we have observed many changes over the years, have commented on them amongst ourselves, and even have some family photos that show the changes. Strangely, I never knew the access was across the McAllister property until the meeting of July 29.

I12-2

Overall there are two assumptions in the Caltrans report and presentation that do not seem very firm.

The assumption that the rate of erosion of the cliff by the ocean will continue at its present rate for sometime is weak. A sample of only fifteen years out of the decades that the cliffs have been more or less stable really does not necessarily indicate a trend. Of course there has to be assumptions like this just to approach the perceived problem, yet with more and more data regarding climate change that assumption might even be weaker.

I12-3

The other assumption that the erosion is coming exclusively from the ocean was questioned in the meeting, and it seems that it needs to be surveyed and studied further.

I12-4

To organize further comments consider the project in three sections: North Cliff, Beach and Bridge, South Cliff.

North Cliff:

This seems like the most acute part of the problem. Considering the engineering expertise and sophistication quite obvious on other parts of Highway 1 just in Sonoma County (e.g. the grade north of Jenner), a cut and grade east of the present road seems like it would handle the problem.

I12-5

Beach and Bridge:

If such a road mentioned above were constructed it could be joined to the existing road north of the existing bridge.

That would certainly make the restoration work describe by Mrs Ballard in the meeting much easier.

Moreover that peculiar proposed beach access pathway would not be needed.

Some ordinary shoulder work, much like along other stretches of the highway, would be sufficient.

I12-6

South Cliff:

From the information available it does not seem like the erosion on the south cliff threatens the road to the same extent as the north. Moreover, if no new bridge is need, no new approach is needed. Also the wells of the McAllisters and the Ballards would not be disturbed.

A faster road is definitely not necessary! So, the conclusion: Build a new section of road for the North Cliff, maintain the shoulders the Beach and Bridge section and the South section.

Thanks for the chance to provide written feedback to the Caltrans plan!

Robert Wachtel
 Coleman Valley Road

Response to Comment Letter I12: Robert Wachtel

Response I12-1	Caltrans would like to thank you for taking the time to participate in the public outreach process. Your comment is noted.
Response I12-2	Caltrans coastal erosion analysis is based on the best available information. Parameters used in the analysis are still supported by recently released data. The analysis assumes that the rate of erosion will increase as SLR occurs, due to increases in the wave energy imparted on the bluff in the future. More information regarding the causes of erosion can be found in the project's erosion study (<i>Coastal Erosion Analysis at Gleason Beach</i> , by WRECO, dated February 2014), in particular, Section 4.1.
Response I12-3	The erosion was considered to be due to a variety of sources such as groundwater, surface water runoff, and earthquakes, in addition to wave action. Wave action was assumed to contribute 25 percent of the total erosion, based on the geomorphic observations and available information.
Response I12-4	Drainage options would be determined as the project design is further refined (after geotechnical drilling is completed) and will consider and address potential causes of the coastal erosion.
Response I12-5	One of the goals of the project design is to avoid the projected year 2100 erosion line along the coastal bluff. This constraint requires placement of the proposed SR 1 alignment further inland.
Response I12-6	One of the goals of the project design is to avoid the projected year 2100 erosion line along the coastal bluff. This constraint requires placement of the proposed SR 1 alignment further inland. In terms of the southern end of the alignment, the southern road conform was chosen in order to align the bridge as far away as possible from the existing Gleason-Mann-Ballard Ranch house.

From: McAndrews, Brian [BMcandrews@tiaa-cref.org]
Sent: Wednesday, July 15, 2015 4:50 PM
To: Rosevear, Thomas@DOT; brianwmcandrews@yahoo.com
Cc: Iberien, Oliver@DOT; Galvez-Abadia, Stefan@DOT; Katie Shea (pkateshea@yahoo.com)
Subject: RE: Gleason beach

Thomas,

Thank you for sending me the document; I do appreciate it. I do have some questions and concerns and I'm hoping you can address. The recently released DEIR shows some parking lot depictions that would significantly and negatively impact the rural view sheds and character of my family's house at 5950 Highway One. I fully understand and appreciate the need to build the bridge over Scotty Creek but placing the proposed parking lot (the dimensions are not clear but it appears very large) directly outside of our house (and two other existing houses) is very troubling. I do hope this is a mistake and changes could be made.

Last year, I reviewed the realignment renderings contained in this link.

<http://www.dot.ca.gov/dist4/gleasonbeachroadway/images/4 Board GB Highway Alt 20 IMG 5084 Pano Final sim.jpg>

As you'll notice, the photo shows roughly 7-10 parking spots closer to the proposed walking bridge and definitely south of our property and current view shed.

The recently released renderings show the parking lot directly east of our house which puzzles me greatly as it appears arbitrary, it is a further trek for the beachgoers to park and get to their desired location, and it destroys our eastern views along with introducing all the other negative externalities associated with public parking lots.

If there must be a parking lot, I would recommend one of two things: one, move it closer to the walking bridge; or two, move it north of the existing homes on that strip of highway one closer to the leach field where there are no homes to be negatively impacted by the parking lot.

I didn't see such explanation and my concern was that the parking pad (don't really know what the dimensions are but it appears to span the length of three homes on the strip) have been placed outside our house which is further north than the original parking pad placement; it may also compromise our ability to get in and out of our garage.

Further, I think we can all agree that we want as little as damage to the natural environment as possible. That said, why put in a parking pad on old SR1 when that would inevitably encroach upon the habitat of the frog/butterflies east of SR1. Why not place the parking pad where you already be tearing up the hillside by the access road or leach field?

Again, thanks for your prompt response; I do appreciate it.

I13-1

I13-2

Response to Comment Letter I13: Brian McAndrews

Response I13-1	<p>Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County.</p> <p>The location of the parking area was selected to avoid environmentally sensitive wetlands while still being as close as possible to the proposed boardwalk and stairs.</p>
Response I13-2	<p>The proposed parking area location is based on minimizing impacts while still servicing the need of roadway users. The pad would be primarily along ruderal habitat, though there would be some overlap onto grazed prairie. As proposed, the parking pad avoids wetlands, and it is located near the access road. The leach field was not considered as it is not a suitable location for development.</p>

From: Ralph Schoolcraft <ralphschoolcraft@msn.com>
Sent: Friday, July 17, 2015 8:27 PM
To: Gleason Realignment@DOT
Subject: proposal Gleason Roadway Realignment

I14

The section of Hwy 1 from the intersection of Bodega Hwy to Jenner is heavily traveled during much of the year, especially during the summer season. There are almost daily automobile accidents many with fatalities. A major part of this serious problem is the almost total lack of passing zones which tempt drivers to pass in no-pass zones. The new roughly half mile highway section is an opportunity to help alleviate the accident rate by providing a third lane at each end for passing. At a very minimum, since there will be no driveway accesses to this new section, build it straight and level enough to allow a passing zone on a two lane highway.

I am a 14 year resident of Bodega Harbour.

Ralph Schoolcraft

Response to Comment Letter I14: Ralph Schoolcraft

Response I14

Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County.

Installing vehicle passing lanes on the new SR 1 alignment is not compatible with ensuring that the alignment is in conformance with Sonoma County's and California Coastal Commission's policies. Much public comment has centered on the scale of the project's proposed structures and how they would be incompatible with the existing composition of the project area. Caltrans will continue to make efforts to minimize the project's impacts. Adding passing lanes within the project area would make that goal more difficult to achieve.

From: Chris Ballard <chrisballard33@gmail.com>
Sent: Tuesday, August 11, 2015 5:51 AM
To: Gleason Realignment@DOT
Subject: Regarding Scotty Creek/Road Realignment

As Caltrans prepares to move forward, I have a few thoughts regarding this realignment that I want to register.

I15-1

First, due to expected erosion of the bluff, the alternative route 20 appears to be the least-desirable option. It will also destroy the spring of Dennis McAllister.

I15-2

Second, it's crucial that more be done to restore Scotty Creek. This is a rare opportunity to repair the damage done to the salmon population, which has been negatively affected by the culvert.

Thanks for your time

Chris Ballard

--
Chris Ballard
Senior Writer
Sports Illustrated
Chrisballard33@gmail.com

Response to Comment Letter I15: Chris Ballard

Response I15-1	Caltrans would like to thank you for taking the time to participate in the public outreach process for the SR 1 Gleason Beach Roadway Realignment Project in Sonoma County. As a result of Caltrans' evaluation of potential environmental impacts associated with the three alternatives discussed in the Draft EIR/EA and public input, Alternative 19A was selected as the Preferred Build Alternative, in part due to potential impacts to water wells under Alternative 20.
Response I15-2	Caltrans recognizes the potential value in improving streambed conditions for salmonids and is considering opportunities to improve Scotty Creek as part of project-related mitigation or enhancement activities. This opportunity will be evaluated further as part of the project permitting phase that follows the environmental document.

I16

COMMENTS

I AM OWNER OF 6175 N. HIGHWAY ONE, ISODECA BAY. YOUR NEW GLEASON BEACH ROADWAY REALIGNMENT WILL PASS MY HOME. I AM IN FAVOR OF THE CHANGE BUT AM VERY CONCERNED ABOUT HANDLING WATER RUN-OFF. I JUST SPENT \$200,000 DEALING WITH RUN-OFF OF FRESH WATER FROM THE HILLS AND UNDERGROUND WATER. I EXPECT CALTRANS TO BE SURE YOUR WATER RUNOFF PLANS ACCOUNT FOR 3 INCHES OF RAIN IN ONE DAY WHICH HAPPENS FREQUENTLY IN THIS AREA. MY HOME IS THREATENED BY WATER RUN OFF. NOT THE OCEAN. YOU NEED TO CAPTURE THE WATER FROM THE ROADWAY AND DIRECT IT UNDERGROUND IN STORM DRAWS, DIRECTED TO THE OCEAN.



GLEASON BEACH ROADWAY REALIGNMENT
 Roadway Realignment and Coastal Access in Sonoma County
 04-Son 1 (PM 15.1/15.7) EA# 04-0A0200

Comments must be received on August 23, 2015 by 5pm
 Email: gleasonrealignment@dot.ca.gov
www.dot.ca.gov/dist4/envdocs.htm

Response to Comment Letter I16: Richard Tucker

Response I16

The proposed drainage facilities will be designed to collect, convey, and discharge runoff generated from the roadway and from areas within Caltrans' right-of-way in a manner that would not impact adjacent properties, and sized to the design storm event identified in the Caltrans Highway Design Manual.

