

April 11, 2022

Ms. Lee Ann Eager, Chair,  
And Members  
California Transportation Commission  
1120 N. Street, MS 52  
Sacramento, California 95814

RE: Jack Peters Creek Bridge Widening and Rail Project

Dear Chair Eager and Commissioners,

We are residents of Mendocino, CA and would like to provide comments regarding the Jack Peters Creek Bridge Widening and Rail Project currently on your 4/13/2022 agenda (Tab 3, Approval of Project for Future Consideration of Funding). The construction during this project will have a great impact on our coastal communities and the Surfwood Estates neighborhood in which we live. Carrice virtually attended and made a comment at your last meeting on 3/16/2022-3/17/2022 in which you postponed your vote on funding of this project.

After your March meeting, the Caltrans project team quickly made efforts to provide information to the public via flyers, notices in the newspaper, and a virtual open house. We commend them for making these efforts; however, these efforts have not satisfied many of the concerns that were brought up by the public. During the virtual open house and via email, Caltrans provided answers to the public's questions/comments. Their answers consisted of Caltrans' intentions for the project but have not provided any relief or mitigation for the important concerns of the public. Here are some of the concerns that have been shared to the Caltrans project team:

Full Nighttime Closures – Emergency Services:

According to Caltrans, full nighttime closures are currently planned for 30+ days during the project from 10:00 p.m. up to 6:00 a.m. There are concerns regarding the negative impact the full nighttime closures will have on emergency response for fire and rescue, and medical issues. Emergency response vehicles respond from the local hospital in Fort Bragg and from the Mendocino Fire Protection District (MFPD). Caltrans' has commented that there will be a "maximum of 15 minutes of delay" to move equipment and materials out of the way for emergency services. **Concern: A 15-minute delay could mean the difference between life and death.**

#### Full Nighttime Closures – No Detour:

Caltrans has said “there are no detours available”. This impacts locals and visitors that need to travel along SR-1 and across the Jack Peters Creek Bridge to their destinations during the nighttime closures. Locals work and recreate in the communities all along the Mendocino coast and may need to cross the bridge to get back home or to their destination during the night. It has been brought to Caltrans attention that there is an option via Little Lake Rd to County Road 409; however, it is through the backwoods, needs improvement, and is not marked. Much of the local community does not even know about this alternate route or have not attempted to drive it because it is inadequate. Caltrans response has been that “Non State Highway System routes are typically not up to CT standards” and that the public needs to work with Mendocino County regarding improvements. Caltrans has also replied that “Residents will need to plan around the full closures” and “It would be up to travelers to determine if there are any detours available.” Caltrans said that full nighttime closures are not uncommon for this type of construction project. However, Caltrans has not yet provided similar projects (as of this writing) that have already occurred for a situation like ours on the Mendocino Coast, where there are no adequate detours available. **Concern: Locals and visitors will not be able to travel to their destination during the bridge closures and/or may get lost or have trouble in trying to navigate an inadequate, unmarked and non-sanctioned detour.**

#### New Pedestrian Bridge Leads to Unsafe Pedestrian Access:

This project includes the building of a new pedestrian bridge. Although a pedestrian bridge is a positive aspect for our community, this particular bridge will immediately lead to an extremely unsafe pedestrian roadway. This project has been promoted as completing a segment of the California Coastal Trail between the South Headlands Trail in Russian Gulch State Park and the Mendocino Headlands Trail. However, there will be a gap between the bridge and the trails, on both the north and south sides of the bridge. The southern end of the pedestrian bridge will immediately lead to Lansing Street which would connect pedestrians to the Mendocino Headlands Trail. However, Lansing Street, which runs along the cliffs above the Pacific Ocean, is extremely unsafe for pedestrians because much of the road does not have *any* shoulder, causing pedestrians to walk in the roadway. This road is well used and has blind curves. Caltrans points out that “The project does create safer pedestrian access along SR-1 within the project limits within the State Right of Way” and that the public needs to work with Mendocino County to mitigate the issue with Lansing Street. It was suggested, both by the public and the Coastal Commission (see their comments published in the final Mitigated Negative Declaration), that Caltrans could explore the possibility of expanding the project scope to include pedestrian improvements from the bridge. At the very least, this pedestrian improvement could be made from the southern end of the new pedestrian bridge, along SR-1 to the traffic light approximately 3900 feet south of the Jack Peters Creek Bridge. The project already includes road changes for approximately 1000 feet to the south of the bridge so it seems the project could be expanded to provide safer pedestrian access all the way to the traffic light. Pedestrians could then safely travel across the bridge to downtown Mendocino, and then on to the

Mendocino Headlands Trail. **Concern: People will believe that this new pedestrian bridge is connecting to the Mendocino Headlands Trail and will attempt to walk down the Lansing Street and perhaps be hurt or killed by vehicular traffic.**

Nighttime Work Causes Negative Effects on Humans:

Although the Mitigated Negative Declaration addresses many environmental effects, it does not address the adverse effects on humans that live nearby. **Concern: Lights and noise during the nighttime construction will cause negative affects on nearby residents.**

Traffic Counts Used for Traffic Mitigation are Unclear and Out-of-Date:

Caltrans is basing their plans for traffic mitigation on studies that were done in 2018. They have said that traffic counters that are utilized for this project are from a continuous count station at "PM 42.95". It is our understanding that this location is at the junction of SR-1 and 128 East, approximately 11 miles from the Jack Peters Creek Bridge. This location is used to travel to/from the Mendocino coast and does not collect data for the local and visitor traffic in the *immediate* area of the Jack Peters Creek Bridge. Caltrans has stated that some data was collected north and south of the bridge and that it correlates to the traffic counters at 128 East. (This particular data has not yet been provided by Caltrans as of this writing). Most of the residents travel between the coastal communities located along SR-1 and much of this travel does not include passing through the area at the junction of SR-1 and 128 East. During a recent informal count of vehicular traffic crossing the bridge on two separate nights, we counted approximately 70 vehicles crossing the bridge from 10:00 pm. to 10:30 pm. each night. The vehicular traffic for this project should be counted/updated along the immediate route of the Jack Peters Creek Bridge. **Concern: If the traffic counts are invalid or out of date, it could affect the issues surrounding the planned full nighttime closures and the estimated time delays of the one-way traffic during most of the construction.**

Mitigated Negative Declaration (MND) - Public Comment:

As was discussed in your March meeting, the communication to the public that had occurred prior to your meeting was inadequate. As an example, Carrice had asked on 7/14/2021 to be on the distribution list for the draft environmental document and did not receive it until after the comment period was over. Plus, many residents/businesses in the Mendocino/Fort Bragg communities were not aware of this project. Caltrans has recently made efforts to improve the communication to the public and this is commendable. However, the MND was not resubmitted for formal public comment. **Concern: The comments received during the virtual open house are not formal and are therefore not made available to the public as they would be after a formal public comment period.**

In conclusion, we respectfully ask that the concerns addressed above be mitigated so the public will be ensured of safety and less adverse effects during and after the construction of the Jack

Peters Creek Bridge. The bridge project would be received by the public more positively if the public knew that these concerns were being adequately addressed and mitigated.

Thank you for your consideration.

Sincerely,

Carrice and Peter Marcovich  
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Ms. Lee Ann Eager, Chair,  
And Members  
California Transportation Commission  
1120 N. Street, MS 52  
Sacramento, California 95814

RE: Jack Peters Creek Bridge Widening and Rail Project (Tab 3,  
Approval of Project for Future Consideration of Funding).

Dear Chair Eager and Commissioners,

We would like to thank you for the attention you paid to our concerns and the resolution you passed to delay action on the Jack Peters Creek Bridge Project at the March meeting in San Diego.

However, following that meeting, Caltrans did not in fact reopen the MND for public comment, or agree to make any changes to the MND based on public comments, as we thought was the tone of the discussion, and the intention of the resolution that you passed after hearing statements from us (Gail and myself), and others. That was certainly our intent when we traveled to appear in person in San Diego.

We did meet with a Caltrans project manager and engineers at our residence on March 21, and met in a follow-up webex meeting to clarify some issues. Notably, that included a discussion of geotechnical issues related to the stability of the very steep riparian hillside leading into the creek and gulch, as well as our new residence a few hundred feet away. Review of the Caltrans geotechnical report left by the project manager indicated that driven displacement piles were 'not appropriate' for the site, and it has been subsequently agreed to (verbally) that driven piles will not be used for any aspect of the project. Caltrans also conducted a virtual (webex) 'open house' last Thursday, April 7. The open house was well attended despite only a 1 week notice to local residents. We noted 48 people on the call, most of whom were still on the call even when the meeting ran 15 min over the 90 min allotted due to questions. Overall we certainly feel that the town hall was a good step to engage the public, but doing this in lieu of formal inclusion in the CEQA MND document, appears to subvert or circumvent the importance of including public input in the planning process. Reopening the MND would also provide an opportunity to correct some glaring errors and omissions in the finalized MND, that led to some potentially incorrect assessment of impacts and required mitigations. Following the town hall meeting, we are particularly concerned about the lack of adequate responses to the following 2 issues:

**1. Impacts of nighttime work with full bridge closures.** First, regarding emergency responses during the closures, the response from Caltrans that delays of 15 min may be required to remove equipment appears inadequate. Indeed, speaking as a critical care physician (I am), a 15 min delay can mean the difference between life or death. Second, with regard to impacts of nighttime work on the intercommunity travel across the bridge, we (the public) suggested that Caltrans should provide a suitable detour using the available bypass route over Little Lake Rd to Route 409. As this is currently unpaved in some parts, and poorly marked, we suggested some upgrade would be prudent prior to undertaking any full nighttime closures. Caltrans refused to consider this, and then provided what appears to be faulty traffic data suggesting little impact – data that will notably also lead to faulty traffic control during the periods of the project. It was even suggested that people would have to find their own work arounds. Again, this policy puts the public in significant danger, as attempts to find alternate routes by those unfamiliar could lead to potentially dangerous travel on unpaved and unmarked routes. Finally, there is the impact of nighttime work on the human species that live in very (very!) close proximity to the work site. One of our close neighbors pointed out that there are all these measures taken to protect the well-being of all species of animals affected by the construction work, but little or no consideration given to the impact on the human species. Indeed the nighttime work will significantly disrupt the rest and sleep of those in close proximity, particularly including us (the Boyle's), the Parry's and the Garcia's, yet there has been

no accommodations offered to address this very significant impact over the proposed 30 days of nighttime work proposed.

**2. Caltrans appears to be building a 'bridge to nowhere'.** While Caltrans points out that this upgrade to 'current standards' is important to provide safe bike and pedestrian traffic over the bridge, and Caltrans touts the connection to the coastal trail, that connection via the new safe passages over the bridge leads to nowhere-with no planned bike and pedestrian routes south of the bridge. Indeed, by creating the illusion that there is a pedestrian and bike access coming from the north, the biking and walking public will end up on a shoulder-less narrow road. We will certainly not use the route because we are familiar, but there is real potential for someone in the unknowing public to get injured or killed on the roadway south, particularly if they try to continue on Lansing street to the next segment of the trail. Coordination with county officials to ensure that there is an appropriate safe route to the south was proposed and was again rejected because that is a Mendocino county road. In our view it should be a contingency of funding this project.

Overall, what we heard during the open house was 'our way or the highway' with no interest in considering the public issues in revising the plan, and literally without a highway option. Despite the long list of questions both we and other residents submitted at the open house, we received nothing more than a rerecital of the same language used in the original MND, which we and the other residents of Mendocino have already taken exception with. Indeed, decision making around this whole project appears driven by forces that do not appear to take account of the public's best interest, with questionable public value as it is currently conceived. In particular, the 2 key issues above need to be adequately addressed. Otherwise, we believe this project poses unnecessary risk to the well-being of both local residents and the visiting motoring, bicycling, and walking public that will be using this bridge.

Caltrans officials have suggested they would summarize our concerns and in a transmittal to the coastal commission in that review process, but we have yet to see an evidence of that, and it does not appear to comport with the SEQA process requirement for public comment. Accordingly, we ask that funding for this project be withheld until the key issues are adequately addressed.

Sincerely,

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Professor Emeritus  
Washington University School of Medicine