

Appendix E Responses to Comments

Table E-1. Responses to Comments

Commenter	Comment Number	Comment	Response
Ms. Marlene Alvarado, Senior Transportation Program Analyst, California Coastal Commission	SA-1-1	We note that Caltrans appropriately proposes to mitigate and temporary impacts at a 1:1 ratio. The draft IS/MND indicates that the project will result in permanent impacts to habitat and wetlands. However, Caltrans does not describe or address mitigation for anticipated direct permanent impacts to ESHA and/or wetlands. Please note the Commission has historically considered temporary impacts to be those where 1) there is no significant ground disturbance (i.e., earthwork including grading that disturbs seedbank); and 2) vegetation recovers to comparable size/age class within 12 months from initial disturbance. All other impacts are considered permanent. For example, in most cases shrubs are not going to recover to the re-existing age class within one year from seed and therefore such impacts should be considered permanent.	The CDP application will be prepared during the permitting process, and will define/differentiate between short-term temporary impacts, long-term temporary impacts, and permanent impacts. Caltrans would coordinate with Marin County and/or CCC for the anticipated CDP (including updated ESHA impact analysis) during the permitting process. Caltrans will coordinate with the CCC, Marin County, and other agencies during the permitting process and will discuss the anticipated Project impacts, ensure the appropriate mitigation measures are selected for the Project, and develop mitigation strategies in coordination with agencies with jurisdiction over affected resources.
Ms. Marlene Alvarado, Senior Transportation Program Analyst, California Coastal Commission	SA-1-2	Please note that Caltrans has outstanding habitat mitigation needs in the subject area and the mitigation needs for this project and the Marin Rumble Strip Project (No. 2-17-0018) could be consolidated.	Caltrans acknowledges your comment. Caltrans will coordinate with the CCC during the permitting process.
Ms. Marlene Alvarado, Senior Transportation Program Analyst, California Coastal Commission	SA-1-3	Finally, at the CDP phase of this project, the vegetation communities will need to be specifically analyzed to determine which communities would be considered Environmentally Sensitive Habitat Areas (ESHA) and coastal wetlands under the Marin County LCP. Development in ESHA or wetlands areas requires specific findings to be approvable and may require additional protective conditions or mitigation measures.	During the CDP phase of the project, Caltrans will define/differentiate between the vegetation communities and will coordinate with the CCC and Marin County LCP to develop the necessary protective and mitigation measures.
Ms. Marlene Alvarado, Senior Transportation Program Analyst, California Coastal Commission	SA-1-4	Incorporating the necessary mitigation into the overall project will allow local government staff to evaluate the entire project for consistency with the certified LCP policies so that they project may be permitted efficiently.	Caltrans acknowledges your comment.
Ms. Erin Chappell, Regional Manager, California Department of Fish and Wildlife – Bay Delta Region	SA-2-1	<p>COMMENT 1: Project Design Analysis and Coordination</p> <p>Issue: The ND notes that bridge abutment at Location 1 will be relocated but does not identify where the abutments will be located or if they will be placed outside of the stream channel. Abutment placement within the stream channel can cause scour impacts and fish passage obstructions. Site-specific locations are needed to ensure the four bridge locations are designed to meet the flow capacity of a given system, protect fish passage in fish bearing systems and to ensure potential barriers are remediated.</p> <p>Recommendation 1 – Design Coordination: Early coordination with Habitat Conservation and the CDFW Conservation Engineering Branch is recommended to provide review and analysis of any proposed structures or Project elements with the potential to impact fish and wildlife resources. CDFW Conservation Engineering Branch should be provided engineered drawings and design specification planning sheets during the initial design process, prior to design selection and re-initiating design consultation at 30 percent design at minimum and through the permitting process for review and comment as identified in the Interagency Agreement (Agreement Number 43A0398).</p> <p>Recommendation 2 – Bridge and Stream Crossing References: CDFW recommends utilizing the design principles outlined in the California Salmonid Stream Habitat Restoration Manual, Part XII (CDFW, 2009) and NOAA Fisheries Service Guidelines for Salmonid Passage at Stream Crossings (NMFS, 2001) into stream crossing designs. CDFW strongly recommends the above manuals are included and referenced when designing the structure and creek work aspect of the Project. Such design allow natural stream flow and sedimentation processes to continue for long term dynamic channel stability.</p>	<p>The abutments at Location 1 will be relocated outside of the stream channel and no work will occur within the creek channel. At Location 1, a gravel bag berm would be placed underneath the bridge, outside of the mean high-water line, and parallel to the abutments to protect the work area and construction activities near the abutments on both the northbound and southbound sides of the bridge.</p> <p>Caltrans will coordinate with the Habitat Conservation and the CDFW Conservation Engineering Branch with the design of the proposed structures or project elements with the potential to impact fish and wildlife resources. Caltrans will provide the CDFW Conservation Engineering Branch with the design plans for review and comment.</p>

Commenter	Comment Number	Comment	Response
<p>Ms. Erin Chappell, Regional Manager, California Department of Fish and Wildlife – Bay Delta Region</p>	<p>SA-2-2</p>	<p>COMMENT 2: Fish Passage Assessment Issue: Multiple potential fish passage barriers exist within the identified Project limits, as described in the recommendations section below. Senate Bill 857 (SB-857), which amended Fish and Game Code § 5901 and added § 156 to the Streets and Highways Code states in § 156.3, “For any project using state or federal transportation funds programmed after January 1, 2006, [Caltrans] shall ensure that, if the project affects a stream crossing on a stream where anadromous fish are, or historically were found, an assessment of potential barriers to fish passage is done prior to commencing project design. [Caltrans] shall submit the assessment to [CDFW] and add it to the CALFISH database. If any structural barrier to passage exists, remediation of the problem shall be designed into the Project by the implementing agency. New projects shall be constructed so that they do not present a barrier to fish passage. When barriers to fish passage are being addressed, plans and projects shall be developed in consultation with [CDFW].</p> <p>Evidence the impact would be significant: The Project contains stream crossings within areas mapped as historic or current watersheds where anadromous fish are, or historically were found. The species include, but are not limited to, Pacific Lamprey (<i>Entosphenus tridentatus</i>), Tidewater Goby (<i>Eucyclogobius newberry</i>), Central California Coast Winter-run Steelhead (<i>Oncorhynchus mykiss</i>), and Coho Salmon (<i>Oncorhynchus kisutch</i>) (BIOS; Ds-1353). The decline of naturally spawning salmon and steelhead trout is primarily a result of the loss of appropriate stream habitat and the inability of fish to get access to habitat, according to reports to the Fish and Game Commission and by the CDFW (CDFW 1996).</p> <p>Recommendations: Restoration of access to historical spawning and rearing areas should be incorporated into the Project design through barrier modification, fishway installation, or other means (CDFW, 1996). If barriers or unassessed barriers noted within the Project limits identified below area found to be an barrier to fish passage, remediation of the problem should be designed into the Project by the implementing agency as a Project feature in consultation with CDFW and other natural resource agencies. CDFW recommends the ND include discussion of the following locations as they pertain to fish passage (See California Natural Diversity Database [CNDDDB] Fish Passage Assessment Database layer DS-69):</p> <p>Location 2: Eskoot Creek Bridge (Location 2), PM 12.37, SR 1, (Longitude 37.90, Latitude -122.64 in Marin County) Fish Passage Assessment Database ID# 12282, fish barrier status: Unknown. A detailed survey per the results of the first pass (reconnaissance) survey is needed.</p> <p>Location 4: Olema Creek Bridge North (Location 4), PM 22.96; SR 1, (Longitude 37.90, Latitude -122.76 in Marin County) Fish Passage Assessment Database ID #12308, fish barrier status: Unknown. A detailed survey per the results of the first pass (reconnaissance) survey is needed.</p> <p>Additional site-specific details for each location should be incorporated in the updated ND, those details can be found here: https://nrm.dfg.ca.gov/PAD/. The fish passage section should discuss the current status of the crossing location noted in the California Fish Passage Assessment Database, conduct first pass and or second pass fish assessments, as necessary, as well as provide images of the upstream and downstream ends of water conveyance structure.</p> <p>Recommended Mitigation Measure 1: Fish Passage Assessment: To evaluate potential impacts to native fish species and fisheries resources, Caltrans shall conduct fish passage assessments as described above and provide the results to CDFW and the CALFISH database. If any structural barrier to passage exists, remediation of the problem shall be constructed so that they do not present a barrier to fish passage. When barrier to fish passage are being addressed, plans and projects shall be developed in consultation with CDFW. CDFW shall be engaged prior to design in early coordination and at 30 percent design at minimum and through the permitting process for review and comment as identified in the Interagency Agreement (Agreement Number 43A0398).</p>	<p>A fish passage assessment was conducted at all bridge locations within the Project limits to assess the suitability of aquatic habitat within the BSAs that could support various life stages of special-status fish species. This assessment was conducted on December 16, 2021. This assessment concluded that all four bridge locations were “not a barrier” to fish passage.</p> <p>Bridge rail replacements would not create or maintain an existing fish passage barrier because the proposed project would not alter the structure of the creek channels.</p> <p>Caltrans will include additional information into the ND to discuss these findings and will submit the fish passage habitat assessment forms into the CALFISH database.</p>

Commenter	Comment Number	Comment	Response
Mr. John Silva	IND-1-1	Under Sec. 1.2 Purpose and Need, it is stated that "Modern vehicles travel at higher speeds than older vehicles at the time the bridges were constructed. Therefore, the bridge railings at these four locations need to be upgraded to reduce the severity of collisions." While it may be true that today's vehicles travel at higher speeds, the fact is that older vehicles tended to be much heavier (because they contained far more steel) to a degree that would offset their slower speed in terms of inertial energy. In any case, the approach to Stinson Beach, where this bridge is located, is a 25 mph zone so vehicles crossing the bridge rarely exceed 35 mph.	Caltrans acknowledges your comment.
Mr. John Silva	IND-1-2	The existing railings of the Eskoot Creek Bridge do not appear to suffer from any obvious deterioration such as spalled concrete or exposed/corroded reinforcing bars. In fact, they appear to be in remarkably good condition.	The Project is needed to meet current Caltrans bridge railing safety standards. Safety standards for roadway design consider speed, transportation modes, surrounding land use, size of current vehicles using the road, and the required safe distances between motorized and non-motorized traffic. The need of the Project is not due to the condition of the existing bridge rails, but rather the type of the existing bridge rails.
Mr. John Silva	IND-1-3	Under Sec. 2.3.1 it is stated that the work would be conducted in stages, with the northbound lane being closed for the time required to replace the rail on that side, and the southbound lane being closed to complete the work on that side. This will have a serious impact on traffic coming into and leaving Stinson Beach, particularly on weekends, as the only alternate route is through a narrow neighborhood street (Arenal Avenue).	The Project will incorporate Project Feature TRANS-1, Transportation Management Plan (TMP). A TMP would be prepared prior to the beginning of construction and in consultation with the appropriate agencies to avoid or minimize potential impacts to transportation. The TMP would identify traffic delays and alternate detour routes for emergency and medical vehicles associated with essential public services during one-way alternating traffic control and would provide notifications and instructions for rapid response or evacuation in the event of an emergency. The TMP would aid in coordinating and providing further safety measures for those accessing SR 1 within the Project limits during construction and would provide priority to emergency vehicles during traffic control.
Mr. John Silva	IND-1-4	Under Sec. 2.3.2 it is stated that the total project duration is estimated to be 19 months, or two working seasons.	The construction schedule defined in Section 2.3.2, is the anticipated construction schedule for this Project.
Mr. John Silva	IND-1-5	Under Sec. 3.3.15 it is stated that the impact on Public Services, including Stinson Beach Fire Department Station 2 (this is an error, the Fire Station at that location is Station 1), is "Less than significant". In the case of the Station 1, this is incorrect. The disruption to traffic adjacent to the station alone will increase response times, particularly on weekends when call volume is high. Many calls occur on Shoreline (Highway 1) south of Stinson Beach or on Panoramic Drive and the only route for equipment coming out of Station 1 to respond to these calls is over the Eskoot Creek Bridge. Lane closure, especially for an extended period, will obviously impact the ability of SBFPD to respond to calls. In addition, response time for Throckmorton Ridge Fire Station (MCFD) as well as for Marin County Sheriff and California Highway Patrol vehicles to calls north of Station 1 would be impacted.	With implementation of PF-TRANS-1, as described in the response to comment IND-1-3, the impact to transportation and emergency vehicle response times would be "Less Than Significant" under CEQA. The FED will reflect the correction of the Fire Station No.
Mr. John Silva	IND-1-6	In summary, it is my opinion that the reason stated in the report for replacement of the rails of the Eskoot Creek Bridge does not justify the impact that this work would have on the ability of the Stinson Beach Fire Protection District to perform its function over an extended period.	Caltrans acknowledges your comment. The reason for the bridge rails to be replaced is to equip the bridge with rails that meet current Caltrans bridge railing safety standards.

Notes:

IND = Individual

NPO = Non-Profit Organization

SA = State Agency