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## North Coast Regional Water Quality Control Board

**TO:** Liza Walker, Eureka Office Chief  
Caltrans North Regional Environmental  
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**FROM:** Susan Stewart, Environmental Scientist / Caltrans Liaison  
NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

**DATE:** September 4, 2024

**SUBJECT: ALBION RIVER BRIDGE PROJECT  
DRAFT EIR/EIS AND DRAFT SECTION 4(f) EVALUATION  
SCH# 2015042016 (EA: 01-40110)**

Dear Liza Walker,

On July 12, 2024, the North Coast Regional Water Quality Control Board (Regional Water Board) received a Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) and Draft Section 4(f) Evaluation from the California Department of Transportation (Caltrans) for the Albion River Bridge Project (Project). The draft EIR/EIS compares and evaluates the potential impacts between three Build Alternatives. The draft EIR/EIS notes that comments must be submitted no later than September 9, 2024. The Regional Water Board hereby submits the following comments.

### **Project Overview**

Caltrans proposes to replace the existing Albion River Bridge (Caltrans Bridge #10-0136), which is located on State Route (SR) 1 in the community of Albion, Mendocino County, California. The project limits on SR 1 are from post mile (PM) 43.3 to PM 44.2. The purpose of the project is to provide a bridge across the Albion River that meets modern seismic safety standards, provides safe and reliable multimodal access, and minimizes ongoing maintenance costs. The project considers three Build Alternatives that would replace the bridge west of the existing bridge alignment, east of the existing bridge alignment, or along the same alignment of the existing bridge. These Build Alternatives include arch and non-arch design options. The project also considers a No-Build alternative.

### **Regional Water Board (RWB) Permitting**

The proposed Project will require a Water Quality Certification under section 401 of the Clean Water Act (33 U.S.C. § 1341) for activities related to Project construction within or affecting waters of the U.S. and waters of the State.

RWB Comment 1): The DEIR/EIS describes five design alternatives (1A, 1B, 2A, 2B, 3A) and a no-build alternative. The Regional Water Board favors the Least Environmentally Damaging Practicable Alternative (LEDPA), a design that would minimize permanent and temporary impacts to aquatic resources, including impacts to three parameter wetlands, river and river bank, and riparian areas. All permanent impacts will require compensatory mitigation.

RWB Comment 2): Evaluation of the developed project design and plans for implementation, including construction access, dewatering for construction activities, and water quality monitoring will be critical for project approval. Detailed plans for construction dewatering and water quality monitoring must be approved prior to construction as part of the Water Quality Certification process. A water quality monitoring plan must comply with the water quality objectives for Albion River as listed within the Basin Plan for the North Coast Region.

RWB Comment 3): While the possibility of using the Mendocino Coast Mitigation Bank is further explored, mitigation alternatives should be considered including on-site mitigation and seeking mitigation off-site at another agency-approved location. The Project is beyond the primary and secondary service areas for the Mendocino Coast Mitigation Bank, and the Regional Water Board will not likely allow the use of this mitigation bank for permit compliance given the current service areas. Avoidance and minimization measures should be fully explored and implemented.

RWB Comment 4): Any off-site and out-of-kind mitigation for impacts to aquatic resources would be required at a higher mitigation ratio using the Army Corps mitigation calculator. Habitat preservation at an off-site location may require a mitigation ratio much higher than enhancement or creation. The Regional Water Board requests that any proposed off-site mitigation be well identified prior to submittal of a Water Quality Certification application and the mitigation calculator be prepared and submitted with the permit application.

RWB Comment 5): The Regional Water Board favors post-construction stormwater treatment on-site in vegetated swales. Stormwater treatment off-site in a location nearby and within the same watershed may be considered.

Thank you for providing the Regional Water Board with the opportunity to comment on this draft EIR/EIS. If you have any questions or comments or would like to discuss these recommendations, please contact Environmental Scientist, Susan Stewart at (707) 576-2657 or by email at [Susan.Stewart@waterboards.ca.gov](mailto:Susan.Stewart@waterboards.ca.gov).

Best regards,

Susan Stewart

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