

---

**From:** Tutwiler, Betsy <betsy@leonardgreen.com> **On Behalf Of** Danhaki, John  
**Sent:** Monday, September 9, 2024 11:35 AM  
**To:** albionbridge@dot.ca.gov  
**Cc:** Laura.Schiller@dot.us.gov; elissa.konove@dot.gov; anthony.tavares@dot.ca.gov;  
matthew.brady@dot.ca.gov; liza.walker@dot.ca.gov; tony.tavares@dot.ca.gov; OPR State  
Clearinghouse <State.Clearinghouse@opr.ca.gov>; ggiovinco@rwglaw.com  
**Subject:** RE: CALTRANS "ALBION RIVER BRIDGE PROJECT" DEIR-DEIS

You don't often get email from [danhaki@leonardgreen.com](mailto:danhaki@leonardgreen.com). [Learn why this is important](#)

By Electronic Mail  
[albionbridge@dot.ca.gov](mailto:albionbridge@dot.ca.gov)

September 6, 2024

Caltrans  
Attn.: Liza Walker  
Chief, Eureka Office, Caltrans North Regional Environmental  
1656 Union Street  
Eureka, California 95501

RE: CALTRANS "ALBION RIVER BRIDGE PROJECT" DEIR-DEIS  
(SCH# 2015042016)

Dear Ms. Walker,

Thank you for this opportunity to comment on Caltrans' fatally flawed draft Environmental Impact Report and Environmental Impact Statement (DEIR-DEIS, dated June 2024) concerning Caltrans' environmentally and financially indefensible scheme to replace the Albion River Bridge (ARB). The Albion River Bridge Project, as outlined in the DEIR-DEIS, seeks to replace, rather than sustainably maintain and preserve, as required by State and Federal regulations, the Federal and State-listed historic and iconic Albion River Bridge on Federal and State protected scenic rural California Coast Highway 1, in Albion, coastal Mendocino County. Out of respect for the thousands of people's lives that will be severely disrupted by a project of this magnitude, out of respect for the taxpayers who ultimately pay for these projects and to be consistent with the priorities and requirements established by the laws of the United States and California, the DEIR-DEIS must be restarted to properly assess **the rehabilitation of the iconic Albion River Bridge as not simply a feasible project alternative but as the preferred alternative**.

-

My comments reflect my personal knowledge of the Albion River Bridge, the town of Albion, as well as the 67 mile road between Cloverdale (turnoff off to Mendocino from Highway 101 for those transiting from the Bay Area) and Mendocino and the 100 mile stretch of Highway 1 between Bodega Bay and Mendocino, arguably the most scenic stretch of coastline in the country, all of which will be negatively impacted by

this project. They also reflect my ten years of involvement in Caltrans' review of alternatives which have included, at my expense, hiring experts on environmental impacts, bridge design, repair and maintenance, legal and other matters.

By training and profession, I am an economist and investor. I recognize a valuable asset when I see it and I understand the rationale related to large capital projects. I own Whitesboro Farm, a horse and cattle sanctuary, south of the ARB and my home in the county is located to its north. The ARB (which accommodates traffic volume of only 3,000 vehicles per day on average) constitutes my – and more importantly the community's and public's - only practical bicycle and driving route through Albion - whether for work, church, recreation, education, or shopping upcoast or downcoast from the village. As well, the Albion River Bridge serves as a major visitor gateway to coastal Mendocino County from the Bay Area.

For a decade I've been interacting with Caltrans as it relates to what was initially characterized as a project to study rehabilitation and replacement alternatives. During this time, I've been struck by the ever-changing, evolving rationale favoring replacement which has been from the start Caltrans' bias. But here's the bottom line. Replacement of the bridge will not make that crossing safer and it will be a colossal waste of taxpayer funds. The construction of a replacement bridge will materially disrupt the lives of thousands of people for 4-6 years. Many of the mostly elderly people in the impacted areas won't even live to see the end of a project of this duration. Businesses north and south of a replacement project will fail, and the real question will be how many in the immediate area will be able to hang on...my bet - few. Today businesses in the area describe 40-60% revenue losses from even short duration road closures. The impact of a 4-6 year replacement disruption is unimaginable. Real estate values totaling in the \$100s of millions will be suppressed for the duration of the project.

A replacement project, which will have substantial negative impact on the community and Californian's seeking to enjoy the Northern Coast for 4-6 years must have a Valid Purpose. No Valid Purpose, singularly or in total, have been proffered come close to supporting disruptions, damage, and expenses of the magnitude of these projects. But let's review a few of the arguments being advanced by Caltrans:

- Economic: Caltrans has suggested that the costs of maintaining the existing structure are prohibitive. For the 20 years from 2001 through 2020, an average of \$354,421.85 per year was allocated to bridge maintenance and upgrade. Preliminary estimates suggest that the cost of a new bridge might be upwards of \$150 million. That suggests a payback of 423 years...far longer than the life of whatever would replace the current structure, an economic investment which defies logic. Any suggestion otherwise represents an insult to the taxpayers of this country. Economic rationale provides no Valid Purpose for replacement.
- Function/safety—overview: The DEIR-DEIS indicates that recent bridge inspections rate ARB as being in "poor and deteriorating condition." Caltrans, it should be noted, has consistently misrepresented conditions for the ARB. For example, a decade ago Caltrans asserted to the community that the deck underlying the asphalt was rotting (one of the myriad and shifting arguments advanced favoring replacement). However, when the asphalt was replaced 6 or 7 years ago, there was found to be no significant rot in the underlying decking - the boards were fine. Experts Dr. Brungraber and Dr. Schmidt in 2018 observed that the ARB was in good condition and noted that if it was maintained appropriately, it could serve its intended purpose for the foreseeable future. **And Caltrans agrees**. As recently as August 13, at a meeting in Albion, Caltrans assured the public that the Albion River Bridge is perfectly safe. Safety related to potential bridge failure provides no Valid Purpose for replacement.
- Function/safety—load rating: The DEIR-DEIS indicates that the ARB has a "low load rating" but omits to disclose that the ARB has no posted vehicular weight limit and fails to consider that the

narrow, winding roads surrounding Albion cause heavy and large vehicles to access Mendocino from the north. Load rating does not prove a Valid Purpose for replacement.

- Function/safety—Road width: The DEIR-DEIS advances the existing ARB's lack of "continuous, safe and separate access for bicyclists and pedestrians" as a basis for replacing the ARB. This notion defies logic. You don't spend \$150 million replacing 970 feet of roadway to provide bike lanes when the roads 10 miles either side of the ARB have no bike lanes and have narrow shoulders and curves that severely compromise sightlines, in short, miles of roads presenting far greater cumulative hazards that could be addressed for a fraction of the \$150mm proposed here. In addition, the DEIR-DEIS fails to take into account speed limits and human nature. I'm a cyclist. There is nowhere on Highway 1 I feel safer than that ARB...because the ARB is straight with excellent sightlines, and vehicles traverse it at far slower speeds versus the winding roads on either side...I'd estimate 25-30mph on the straight bridge deck versus 40-50+mph on the winding roads either side of the ARB. In 80 years, there has not been a single fatality on the ARB despite in excess of 50 million cumulative crossings. Injuries and crashes will be far more likely given the higher speeds if the ARB is replaced, especially given the Albion Little River Road intersection at the north end of the ARB. Road width does not provide a Valid Purpose for replacement.
- Function/traffic disruptions: The DEIR-DEIS suggests that "full bridge closures" for "inspections, maintenance, repairs or safety" might disrupt traffic unless the ARB is replaced. This one has me baffled. Suggesting a 4–6-year replacement project requiring absolute, long duration, consequential and non-stop lane closures, bridge closures, noise, time and disruption to avoid infrequent and theoretic traffic disruption of an inconsequential nature associated with maintaining the status quo...Caltrans can't be serious here? Amelioration of traffic disruptions associated with ordinary course maintenance of the exiting bridge is not a Valid Purpose for replacement.
- Safety—Fracture critical: It has been noted several times that the steel truss section is fracture critical, meaning that the failure of a single element might cause catastrophic failure. The engineers I've hired have carefully examined the steel truss, as have Caltrans' own inspectors. They note that the steel truss section is a repurposed railway bridge, designed to carry trains with 100+ ton locomotives, far, far greater loads than required at the Albion River crossing. The steel truss may be fracture critical, but it is safe, over-designed and over-built for its current purpose. The Bay Bridge, which was replaced at a cost of over \$6.5 billion is fracture critical. If fracture critical is okay for the brand-new Bay Bridge, why should the ARB be held to a different standard? The fracture critical status of the existing bridge is not a Valid Purpose for replacement.
- Safety—seismic: Drs. Brungraber, Schmidt and Hassan Astaneh, a renowned expert in studying bridge failure, have all confirmed that the structure as designed, because of the inherent flexibility of wood, can tolerate significant seismic activity, consistent with or superior to concrete structures. They note that the steel truss system needs to be tied down to eliminate the potential for seismic damage. With that qualification (which Caltrans has so far partly addressed), seismic risk is not a Valid Purpose for replacement.
- Safety—Tsunamis: This one popped up right after Fukushima...a sensational rationale favoring replacement related to potential damage during a tsunami, with Caltrans' standard at the time being a 1000-year event! Caltrans' own engineers acknowledged that the ARB would survive such a tsunami. They speculate that the receding waters might pick up debris which might undermine the ARB. The ARB has survived, untouched, tsunamis up and down the coast, including the tsunami in 1964 from the Alaskan earthquake that wiped out Crescent City. The risk of tsunamis does not represent a Valid Purpose for replacement.

Environmental Impact—Without going through the presentation in detail, the DEIR-DEIS is beyond incomplete for several reasons. First off, we do not even know which replacement bridge is being proposed. What we do know is that whatever would be built would impact the environment in ways not addressed by the DEIR-DEIS. For example, without giving measure to transport and construction, the concrete required to build a new bridge will likely generate in excess of 100,000,000 pounds of CO<sub>2</sub>.

Detours totaling millions of miles and 100s of thousands of hours will inconvenience people and generate in excess of 1 billion pounds of CO<sub>2</sub>. In addition, the deconstruction of the existing ARB will disrupt flora, fauna and marine life while potentially releasing tons of toxins associated with the current timber into the surrounding environment.

Economic Impact—The DEIR-DEIS dramatically understates the economic impact of 3-5 years of new bridge construction on local communities and the additional year or more spent dismantling and removing the ARB. A high percentage of the tourists coming from the Bay Area will avoid the construction zone, choosing other locations or a 25 mile longer trek via Highway 20. There are few inns or restaurants between Albion and Mendocino that are likely to survive given the duration and scope of the project. But it will go farther than that. Coastal towns including Bodega Bay, Sea Ranch, Gualala, Point Arena, Manchester, Elk, Albion and Mendocino will all be impacted. Towns on State Highway 128 will be similarly impacted by 4-6 years of disrupted traffic flows. Thousands of people will be delayed.

History—The Albion River Bridge is the last wooden trestle bridge on the West Coast. It is a marvel of engineering and American ingenuity, constructed as it was during World War II when materials were in short supply. It is a National Registered historic treasure. It is the pride of Albion. Removing a symbol of this importance will be a local and a national tragedy. Replacement won't improve safety and it will be a colossal waste of money. Thousands will see their lives turned upside down and many of the elderly locals impacted by the project won't even live to see its completion given the 4–6 year duration of the project. To borrow from Joni Mitchell, let's not pave paradise. Let's honor history and do the responsible thing by rehabilitating the Albion River Bridge.

Thank you for your consideration,

John Danhaki  
M: 310-567-6276  
[johngdanhaki@gmail.com](mailto:johngdanhaki@gmail.com)

cc: Mr. Pete Buttigieg  
Secretary, United States Department of Transportation  
Attn: Chief of Staff Laura Schiller  
[Laura.Schiller@dot.us.gov](mailto:Laura.Schiller@dot.us.gov)

Ms. Elissa Konove  
Administrator, US Federal Highway Administration, Sacramento  
[elissa.konove@dot.gov](mailto:elissa.konove@dot.gov)

Mr. Tony Tavares  
Director, Caltrans  
[anthony.tavares@dot.ca.gov](mailto:anthony.tavares@dot.ca.gov)

Mr. Matthew Brady  
Director, Caltrans District 1  
[matthew.brady@dot.ca.gov](mailto:matthew.brady@dot.ca.gov)

Ms. Liza Walker, Caltrans District 1  
[liza.walker@dot.ca.gov](mailto:liza.walker@dot.ca.gov)

Ms. Christine Asiata Rodriguez

Manager, State Clearinghouse, Governor's Office of Planning and Research  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

-

Ms. Ginetta L. Giovinco  
Attorney, Richards Watson Gerson  
[ggiovinco@rwglaw.com](mailto:ggiovinco@rwglaw.com)

DISCLAIMER: This email (including any attachments) is intended solely for the person or entity to whom it is addressed and may contain confidential, proprietary or privileged material. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this email in error, please notify the sender immediately then permanently delete the email and all copies (including any attachments). This email (including any attachments) is not intended as an offer to buy or sell, or a recommendation to buy or sell, any security. All email sent to or from the Leonard Green & Partners, L.P. ("LGP") email system is subject to archiving, monitoring, and/or review by LGP personnel.