

MONTEREY COUNTY HISTORIC RESOURCES REVIEW BOARD

JANUARY 5, 2023

AGENDA ITEM NO. 2



Additional Correspondence

PLN220090 - CALIFORNIA DEPARTMENT
OF TRANSPORTATION (GARRAPATA CREEK
BRIDGE)

From: [Sara A. Clark](#)
To: [300-hrrbhearingcomments](#); [Lundquist, Erik](#)
Cc: [Christina McGinnis](#)
Subject: Request for Continuance//Comment Letter re Item 2
Date: Tuesday, January 3, 2023 1:51:24 PM
Attachments: [Historic Review Board Letter \(1.3.22\).pdf](#)

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Mr. Lundquist,

On behalf of Keep Big Sur Wild, I write to ask for a continuance of the January 5, 2022 Historic Resources Review Board hearing on the Garrapata Bridge Rail Replacement project. The agenda packet contains over 800 pages of materials related to this item, and many people have been unable to review because of the holidays. A short continuance to allow adequate review of the materials would be most appreciated.

In addition, please find attached correspondence concerning this item, as well as two video clips. Please confirm that you can access the videos and that they will be included in the project file.

https://drive.google.com/file/d/1pfHPob_ICCyIZIKzdePkD2nIP9QDDxEz/view?ts=63b4843a

 [IMG_3731.MOV](#)

Best,
Sara



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January 3, 2022

Via Electronic Mail Only

Chair John Scourkes
Historic Resources Review Board
County of Monterey Government Center
1441 Schilling Place
Salinas, CA 93901
Email: hrrbhearingcomments@co.monterey.ca.us

Re: Item 2: Garrapata Bridge Rail Replacement Project (PLN 220090)

Dear Chair Scourkes and Members of the Board:

This firm represents Keep Big Sur Wild (“KBSW”) in matters related to the proposed replacement of the bridge rails on Garrapata Bridge and other historic concrete arch bridges along the Big Sur Coast (“Bridge Rail Project”), and we submit these comments on their behalf. Keep Big Sur Wild is a group of residents concerned with protecting the scenic landscape, sensitive natural resources, and wild, rural character of the Big Sur coastal region. As you know, Cal Trans suggests replacing the bridge rails on six concrete arch bridges that are individually eligible for listing on the National Register of Historic Places, and that are contributing resources to the Carmel San Simeon Historic District, including the iconic Bixby Bridge. KBSW is deeply concerned about the Garrapata Bridge Rail Project’s impact on visual resources and its precedent-setting potential, as detailed below. We appreciate your Board’s questions and engagement on this important topic, and request a continuance of this item given that the Agenda packet and report was released to the public over the holidays and contain 880 pages of material.

There are four important issues that remain unaddressed with respect to the Bridge Rail Project. First, while the EIR prepared by Caltrans for the Garrapata Bridge Rail Project and the overall Bridge Rail Project recognizes a cumulatively significant aesthetic/visual impact that cannot be mitigated, the EIR fails to consider the ways in which approval of the Garrapata Bridge Rail Project will impact future consideration of rail replacement projects on the other bridges. Once a project approach and design is selected for the Garrapata Bridge, it will effectively set the standard for the other bridges.

KBSW agrees with the concerns noted in the Board’s December 1, 2022 Staff Report (“Will the decision on the Garrapata bridge rails have a cumulative effect on all seven historic concrete arch bridges? Staff’s analysis is that this issue is not clearly explained by CalTrans. It is staff’s opinion that the decision on the Garrapata bridge rails can and will influence future decisions on bridge rails on the six other historic concrete bridges.”)

Second, CalTrans prepared an EIR on both the Garrapata Bridge Rail Project and the broader Bridge Rail Project. However, the EIR is inadequate, and cannot be relied on in the County’s consideration of the Garrapata Bridge Rail Project. Specifically, the EIR relies on incomplete studies that were not made available before its certification, such as a traffic safety study and other historic resource information and coordination.

Third, the available information is inconclusive at best with respect to the proposed design’s impact on visual resources. The current structure provides good visibility for the traveling public to the scenic coastal resources adjacent to Garrapata Bridge, as see in Figure 1-10 of the EIR and in the two video clips submitted with this letter. The 86H Front Elevation Photo Simulation, provided as page 9 in Exhibit B to the December 1, 2022 Staff Report, appears to show some visibility through Garrapata Bridge to the scenic resources below. However, other models show that the smaller openings and the increase in bridge thickness appear to have a significant impact on the ability of the traveling public to view scenic coastal resources from Garrapata Bridge. *See* 86H North End Block Photo Simulation and 86H South End Block Photo Simulation, provided as pages 10 and 11 in Exhibit B to the December 1, 2022 Staff Report. In both of these simulations, taken from angles rather than perpendicular to the bridge railing, the view through the railing appears to be completely blocked, *eliminating* the view of coastal resources adjacent to Garrapata Bridge. Additional simulations, including video simulations comparing the current and proposed views of the traveling public, must be provided to thoroughly evaluate this issue. KBSW believes that such simulations would show a severe decrease or elimination in views through the bridge railing. This result would destroy a key aspect of the bridges’ historic nature and conflict with the Big Sur Land Use Plan. *See, e.g.*, Policy 2.2.5 (“Visual access should be emphasized throughout Big Sur as an appropriate response to the needs of visitors. Visual access to the shoreline should be maintained by directing future development out of the viewshed.”); Section 3.2 (“the issue of visual resource protection is probably the most significant and far reaching question concerning the future of the Big Sur coast.”); Policy 4.1.2.2 (“A principal objective of management, maintenance, and construction activities within the Highway 1 right-of-way shall be to maintain *the highest possible standard* of visual beauty and interest.”) (emphasis added); Policy 6.1.4 (“Visual access should be protected for long

term public use.”). The County must request sufficient information from CalTrans to evaluate this issue before reaching a decision on the requested permits.

Fourth, CalTrans has failed to justify the necessity of the Bridge Rails Project for at least three reasons. The existing bridges are narrow and often congested due to tourist traffic. Traffic generally slows through these areas under current conditions, and a reduction in the speed limit approaching and over the bridges would seem to be both supportive of these on-the-ground conditions and without significant impact on overall speed. Additional evaluation of this issue is warranted, beyond the December 1, 2022 Staff Report’s brief comment that “the speed cannot/should not be reduced.”

Second, the MASH Standards only apply to new projects. As CalTrans explained in its August 15, 2022 Supplemental Application Information: “Newly adopted MASH standards have mandated that all *new* installations of roadside safety devices on high-speed roadways, including bridge railing, must meet a new higher standard for crash testing for all projects implemented.” However, the bridge rails are not a *new* installation, they are existing infrastructure that should be repaired, not replaced.

Third, the underlying safety need for compliance with MASH Standards has not been demonstrated. Available traffic and accident data appear to show little public safety risk from repairing the bridge rails in their current form. As best we can tell, no accidents have occurred on any of these bridge. The loss of these significant historic resources and visual access is not justified by an unnecessary desire to simply upgrade infrastructure because general standards have changed.

For these reasons, KBSW agrees with County staff that “defining the sole purpose of the project to be the preferred alternative, replacement of an existing rail with a new compliant rail, forecloses evaluation of a reasonable range of project alternatives as required by CEQA.” December 1, 2022 Staff Report, Exhibit A; *see also North Coast Rivers Alliance, et al. v. Kawamura* (2015) 243 Cal.App.4th 647. These alternatives—either reducing the speed limit at the bridges and/or recommending an exception to the MASH standard—must be more thoroughly evaluated.

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Thank you for your time and attention to these important issues.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

A handwritten signature in blue ink that reads "Sara A. Clark". The signature is written in a cursive style with a large initial 'S'.

Sara A. Clark

Encl.