

From: [Drake, Sean@Coastal](mailto:Drake,Sean@Coastal)
To: [293-pchearingcomments](#)
Cc: Carl, Dan@Coastal; Kahn, Kevin@Coastal; Dallas, Mitch@DOT; Wilson, Michelle@DOT
Subject: Monterey County PC Item 5 PLN220090
Date: Tuesday, February 21, 2023 3:04:48 PM
Attachments: [CCC comments 2023.2.21 PLN220090.pdf](#)

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Dear Chair Monsalve:

Please see the attached letter to the Monterey County Planning Commission regarding PLN220090 (Caltrans Garrapata Creek Bridge Railing Replacement), which is Item #5 on the agenda for tomorrow's Planning Commission meeting. Please do not hesitate to reach out to me with any questions or for further discussion.

Thank you,
Sean

--

Sean Drake
Senior Transportation Analyst
California Coastal Commission
(916) 445-6033

CALIFORNIA COASTAL COMMISSION

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**February 21, 2023**

Etna Monsalve, Chair
Monterey County Planning Commission
168 W. Alisal St.
Salinas, CA 93901

Subject: February 22, 2023 Monterey County Planning Commission Item PLN220090, California Department of Transportation (Caltrans) Garrapata Creek Bridge Railing Replacement

Dear Chair Monsalve and Planning Commissioners:

I am writing regarding Agenda Item 5 for the February 22, 2023 meeting of the Monterey County Planning Commission, which contains a recommendation from your staff that the Planning Commission approve a coastal development permit (CDP) for Caltrans to replace the railings on Garrapata Creek Bridge on Highway 1 in Big Sur. This project is the first of six anticipated projects that propose to replace the railings on Big Sur's historic arch bridges with a new, different type of railing, and so the comments herein are germane both for the particular project before you and for the others expected to come forward in the future.

Highway 1 in Big Sur is designated as an All-American Road (generally reserved for highways considered destinations in themselves), an American National Scenic Byway, a state scenic highway, part of the Pacific Coast Bike Route, and it is an intrinsic and an important element of what is commonly described as the one of the most scenic areas in the world. Big Sur's six arch bridges are not only a fundamental component of all of those designations, but they are also state and federal historic structures in their own right. Thus, the proposed project should not be approached in the manner of a conventional railing replacement project, as this project affects truly exceptional, significant, and protected cultural and visual resources. We are also mindful that whatever railing approach is applied at Garrapata Creek Bridge may also become a model for the other five historic arch bridges, and thus this undertaking warrants the utmost delicacy.

We sincerely appreciate the effort that Caltrans, County staff, and the Big Sur community have put into developing and evaluating alternative designs to date, including Caltrans' previous convening of an Aesthetics Design Advisory Committee. It is evident that Caltrans intends for the proposed replacement railing design to resemble the existing railing while complying with the current engineering standards applicable to a 55-mph bridge. Based on simulations provided by Caltrans staff, we observe that the proposed railing alternative would be visibly bulkier and would adversely alter the iconic look of Garrapata Creek Bridge. For this reason, and as we have previously discussed with Caltrans, we believe additional evaluation is needed to satisfy the Monterey County LCP policies protecting visual and historic resources, as well as the policy of Caltrans' Big Sur Coast Highway Management Plan stating that replacement railings on historic bridges should match the existing railings as closely as possible.

Specifically, we believe that Caltrans should give additional consideration to the preliminary question of whether avenues exist to lower the speed limit at Garrapata Creek Bridge. This belief is motivated by an awareness that, based on our discussions with Caltrans, replacement

railings could replicate the existing railing design while still meeting required safety standards if the speed limit on the bridge was reduced by 10 mph to 45 mph (a speed limit deemed acceptable for another world-famous Highway 1 bridge, the Golden Gate Bridge). We suggest that Caltrans explore additional alternatives that may allow for a 45-mph speed limit, including conducting additional speed tests to more broadly capture traveling speeds on the bridge throughout various times of year, evaluating possible traffic calming measures that could be employed in the vicinity of the bridge to influence lower travel speeds, and pursuing an exception to the conventional protocol for setting speed limits. Since reducing the speed limit to 45 mph could potentially address all parties' needs (visual/historic resources as well as safety), we continue to encourage Caltrans to fully evaluate the feasibility of this approach before the County takes action on the CDP application (where any such County action can be appealed to the Coastal Commission). We believe that it would be prudent for the Planning Commission to postpone taking a final CDP action on February 22, to allow these issues to be resolved.

If, after such an evaluation, there truly is no available avenue within Caltrans' current body of standards to replace the railing with a replica design, we believe that Big Sur's arch bridges possess such unique cultural, historical, and visual significance to the people of California that it would be both reasonable and prudent for Caltrans to explore creating new, project-specific methods of excepting these structures from the standards applied to other bridges. From our close and longstanding working partnership with Caltrans, we are confident that the agency is capable of conceiving innovative strategies for ensuring the safety of the traveling public while maintaining these bridges as they have persisted for nearly a century. Indeed, the ultimate standard guiding any project on Big Sur's arch bridges should be that the project is as exceptional as the bridges themselves. It is our impression from the materials reviewed to date that more work is needed to meet this standard, including for Caltrans to fully consider, and if need be, to innovate new strategies that would enable the bridge railings to be replaced with a replica design.

We appreciate your close attention to this item and your thoughtful consideration of our comments and concerns.

Sincerely,

A handwritten signature in cursive script that reads "Sean Drake".

Sean Drake
Senior Transportation Analyst
California Coastal Commission



Planning Commission
Monterey County
February 22, 2023

Combined Development Permit No. PLN2200090
Mitch Dallas, Senior Coastal Resources Specialist

<https://dot.ca.gov/caltrans-near-me/district-5/district-5-current-projects/05-1h800>



Purpose and Need

Project Purpose

This project proposes to upgrade the existing nonstandard bridge railing to current standards in order to ensure the safety and reliability of Highway 1.

Project Need

The reinforced concrete barrier rail posts have deteriorated along 75% of the left and right barrier rail lengths. Severe cracking with unsound concrete and spalls with exposed rusted rebar have been documented in the Bridge Inspection Reports.

Considerations

- Existing railing was constructed in 1931 and is damaged beyond repair as determined by Caltrans' Headquarters Division of Maintenance-Office of Structure Maintenance and Investigations.
- New railing must meet modern safety standards for modern vehicle size, weight and speed in addition to safety requirements for bikes and pedestrians.
- District Traffic Safety Engineers are unable to request a design exception or recommend a reduction in speed limit.
- Considerable public concern about the bridge.

Existing photos of the Garrapata Creek Bridge







Why does the replacement rail need to be built to modern safety standards?



Safety for Millions of People

Environmental Protection



Design Constraints

The existing rail is damaged beyond repair. There is no solid foundation for repair.

Since the open windows in baluster-style rails can be “catch points,” where vehicles’ bumpers can potentially catch on the rails, which could cause or worsen accidents, current safety standards require a higher base height, thickness, and top rail thickness to accommodate modern vehicle designs, weights and existing speeds.

A **speed zone survey** specific to the Garrapata Creek Bridge was completed in December 2019. The survey resulted in 85% of the surveyed vehicle speeds being above the posted 55 MPH speed limit. The 85th percentile speed does not allow for Caltrans to reduce the speed limit. The traffic analysis determined that reducing the speed limit could not be justified and replacing the rail in-kind would not meet the safety requirements for the posted speed limit.

Environmental Concerns

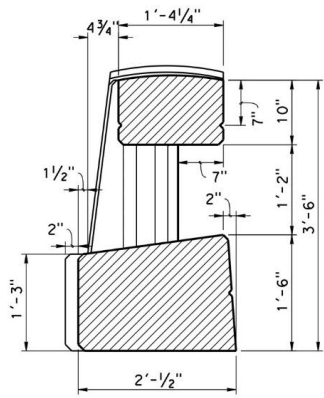
- Garrapata Creek Bridge is eligible for the National Register of Historic Places and is a ***contributing*** resource of the Carmel-San Simeon Highway Historic District.
- Highway 1 in Big Sur is designated as an All-American Road and State Scenic Highway.
- Maintenance of Highway 1 in Big Sur is guided by the Big Sur Coast Highway Management Plan.
- Visual & historic resources

Proposed Design

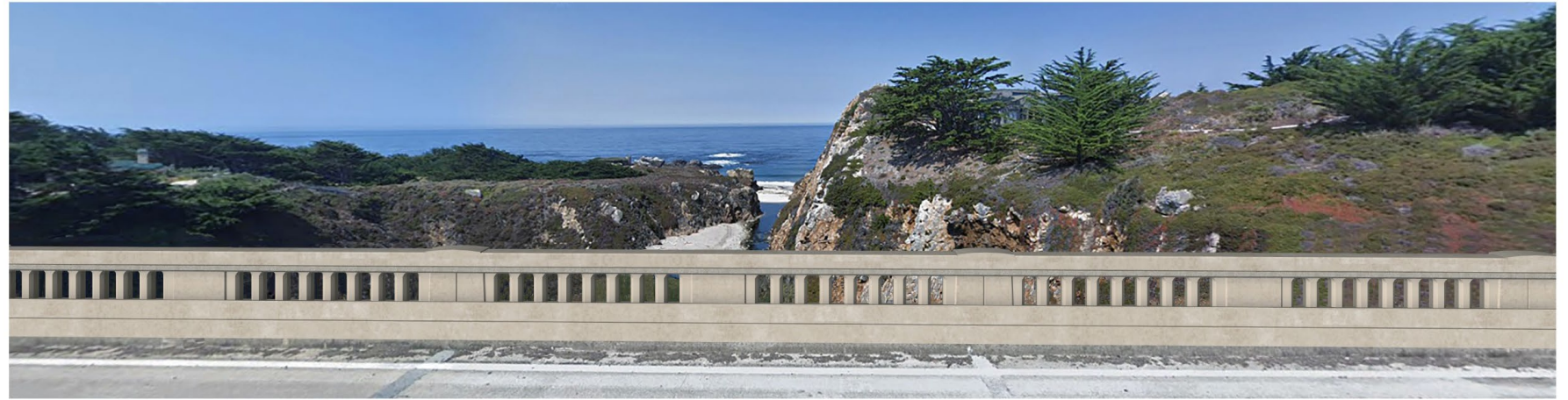
- Over the past two and a half years, Caltrans has conducted extensive public outreach including formation of an **Aesthetic Design Advisory Committee (ADAC)** to solicit additional detailed input from the public and professionals in historic preservation during **6 design specific ADAC meetings**.
- CEQA/NEPA review, Section 4(f) Evaluation, Section 106 Consultation with the State Historic Preservation Officer (SHPO), & Tribal Consultation have been completed.
- The **custom designed** Type 86H rail has been selected for this specific bridge. Based upon the design safety requirements, environmental impact analysis, public and professional input.

Comparison of Existing Rail Dimensions with Proposed

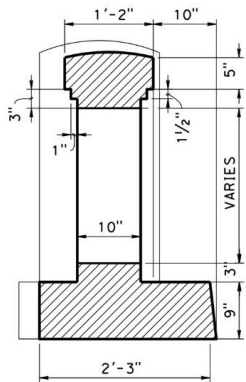
Element	Original Rail (in inches)	Type 86H (in inches)	Change in Appearance
Rail height	42"	42"	None
Arch window height (to top of arch)	20"	15.125" at traffic face of baluster; 16.125" at back side of baluster	Reduction in arch window height by 4.875" at traffic face & 3.875" at back side
Arch window width	10" (squared edges)	6" (1.5" chamfered edges to increase view through window)	Reduction in arch window width by 4"
Baluster length (parallel to traffic)	6"	6"	No change
Baluster width (depth) transverse to traffic	5"	7.5"	Increase in baluster width by 2.5"
Base height of curb at traffic face	9"	18"	Increase in base height by 9"
Base width (depth) of baluster rail on bridge	21"	24.5"	Increase in base width by 3.5"
Height at base of arch windows (above bridge deck/Finish Grade [FG])	12"	18"	Increase in height of base at arch windows by 6"
Top rail height	9"	10"	Increase in top rail height by 1"
Top rail width (depth) transverse to traffic	10"	16.25"	Increase in top rail thickness by 6.25"



TYPE 86H SECTION



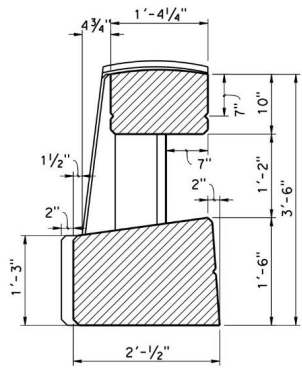
TYPE 86H ON DECK VIEW



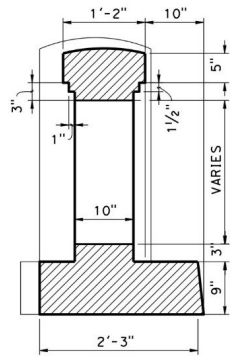
EXISTING SECTION



EXISTING ON DECK VIEW

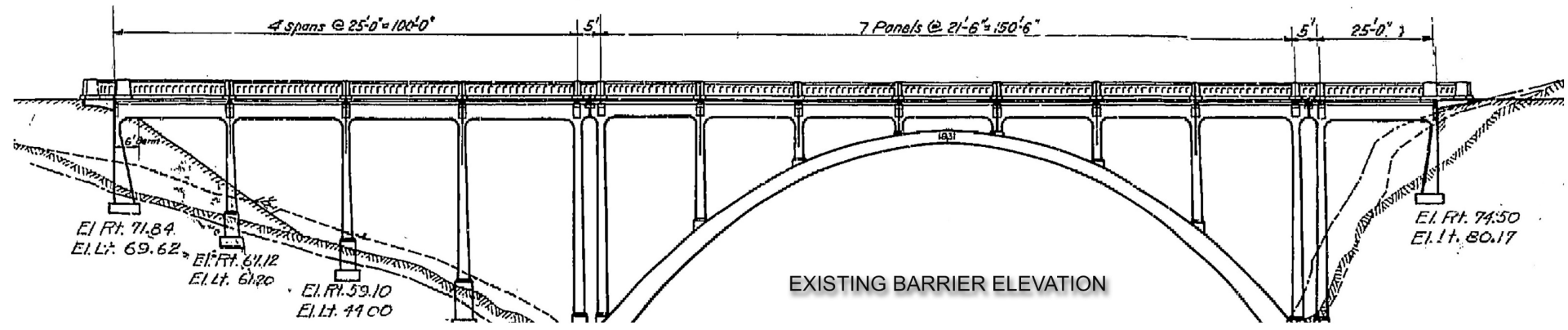
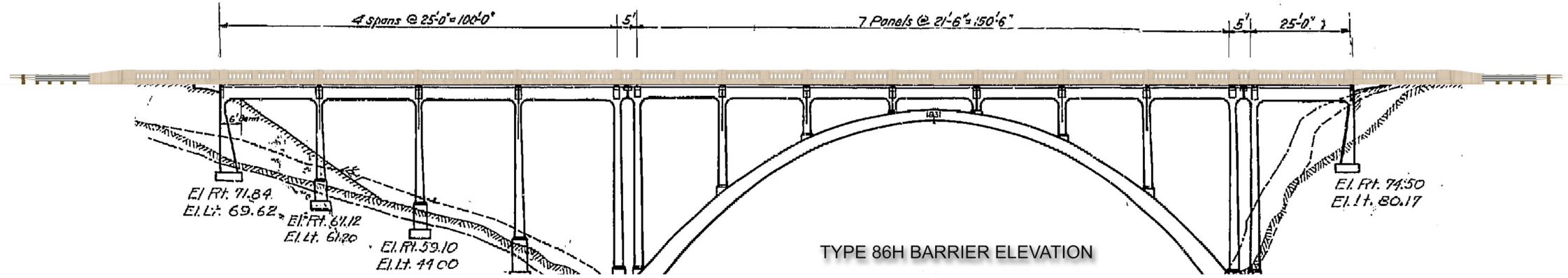


TYPE 86H SECTION



EXISTING SECTION







86H NORTH END BLOCK PHOTO SIM.



86H SOUTH END BLOCK PHOTO SIM.

Mitigation Measure Examples

- Stipulations of the Memorandum of Agreement with the SHPO:
 - Historic American Building Survey/Historic American Engineer Record/Historic American Landscape Survey (HABS/HAER/HALS) documentation in coordination with National Park Service (NPS).
 - DPR 523 Inventory Forms for all 7 Big Sur Arch Bridges (Big Creek, Bixby Creek, Rocky Creek, Garrapata Creek, Granite Canyon, Malpas Creek, & Wildcat Bridge) focusing on their specific historic design context.
 - Lesson plan for elementary school aged students.
 - Interpretive website
- Applicable measures for biological resources & air quality/GHG emissions; and Traffic Management Plan.



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SARA A. CLARK
Attorney
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February 20, 2022

Via Electronic Mail Only

Chair Etna Monsalve
Monterey County Planning Commission
County of Monterey Government Center
168 W. Alisal St.
Salinas, CA 93901
Email: pchearingcomments@co.monterey.ca.us

Re: Item 5: Caltrans/Garrapata Bridge Rails

Dear Chair Monsalve and Members of the Commission:

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.

There are four important issues related 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, including Bixby Bridge. KBSW agrees with the concerns noted in the Historic Resources Review 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, 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 seen in Figure 1-10 of the EIR and in the two video clips submitted with this letter. The Planning Commission Staff Report provides little information about the visibility through the proposed railing. However, information provided to the Historic Resources Review Board 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 Historic Resources Review Board Staff Report, and reproduced at the end of the letter. 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 for the Planning Commission 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, and provide this information to the Planning Commission, in order to evaluate this issue before reaching a decision on the requested permits. KBSW also asks that the Planning Commission consider alternative designs, including one that mimics the size of the existing openings.

Third, 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.

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.

The MASH Standards likewise 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.

Finally, 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 Historic Resources Review Board Staff Report, Exhibit A; *see also North Coast Rivers Alliance, et al. v. Kawamura* (2015) 243 Cal.App.4th 647. Alternatives—such as further revising the size of the openings or recommending an exception to the MASH standard—must be more thoroughly evaluated.

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Monterey County Planning Commission
February 20, 2022
Page 4

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.



86H NORTH END BLOCK PHOTO SIM.

GARRAPATA CREEK BRIDGE BARRIER TYPE 86H

09/06/22

Prepared by: DES, Bridge Architecture and Aesthetics





86H SOUTH END BLOCK PHOTO SIM.

GARRAPATA CREEK BRIDGE BARRIER TYPE 86H

09/06/22

Prepared by: DES, Bridge Architecture and Aesthetics



From: [Angelo, Philip](#)
To: [Angelo, Philip](#)
Subject: RE: PUBLIC COMMENT RE PLN220090 Garrapata Bridge Rail Replacement Project
Date: Tuesday, February 21, 2023 12:35:07 PM
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)

From: Martha Diehl <mvdiehl@mindspring.com>
Sent: Tuesday, February 21, 2023 12:29 PM
To: Angelo, Philip <AngeloP@co.monterey.ca.us>; Spencer, Craig <SpencerC@co.monterey.ca.us>
Cc: Lundquist, Erik <LundquistE@co.monterey.ca.us>; Donlon, Kelly L. <DonlonKL@co.monterey.ca.us>
Subject: PUBLIC COMMENT RE PLN220090 Garrapata Bridge Rail Replacement Project

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From: Martha Diehl <mvdiehl@mindspring.com>

Subject: PLN220090 Garrapata Bridge Rail Replacement Project - Public Comment
Date: February 21, 2023 at 12:09:56 PM PST
To: Martha Diehl <mvdiehl@mindspring.com>

Mr. Angelo,

Unfortunately I will be unable to participate in the hearing on this item. I need to attend to urgent personal matters. It appears I would have been unable to participate as a Planning Commissioner in any case since my driveway right-of-way joins the highway less than 300' from the Garrapata Bridge and since I have been involved with this project for several years already. I therefore recuse myself.

However this is an extremely important matter that impacts the future of the Big Sur National Scenic Byway and thus the physical and economic future for all of us here. Therefore I am submitting the following comments on this item as a concerned member of the public. Please make this email, and all my prior correspondence on this item including all the attached exhibits, available to everyone at the hearing and include all this material in the project records going forward:

Thank you,

Martha Diehl

2/21/23

Dear Commissioners,

Ask that you DENY the permit requested by CalTrans for the proposed Garrapata Bridge (aka 'Little Bixby') Rail Replacement Project.

This project as proposed would constitute a major error in the management of the Big Sur National Scenic Byway/All American Road and will result in the removal of visual access to scenic resources enjoyed by millions each year. The views through the existing open balustrade railings are iconic in the true sense of the word. I am confident everyone here is familiar with their images. They are featured in the foreground of movies and TV series, in the background of every local and regional newscast, define the Big Sur International Marathon & the Tour d'Elegance, and grace millions of walls all over the world. What happens to these bridges really is of enormous importance. We absolutely must get it right. This is not right.

It is probably unnecessary to restate the nearly incalculable importance of preserving the scenic and visual character of the drive from Carmel to Cambria on Highway 1. This piece of roadway is, besides providing the sole access to over 70 miles of coastline, consistently ranks in the top 5 driving destinations world wide. Indeed the turnout at the Bixby Bridge was the number one Instagram location in the world in 2019. At best estimate well over 5 million cars containing an average of 2 people per car travel over this bridge every year. Whatever happens on this highway matters well beyond its immediate vicinity.

Here is the seaward view at the Garrapata Bridge that will be lost to those 10 million people if the current design is approved. CalTrans has not provided comparable visual information for their proposed design.

[Click to Download](#)

IMG_8899.mov
20 MB

CalTrans has evaluated the situation from the point of view they are mandated to prioritize, which is safety as defined in their operating manuals. Managing a worldwide scenic destination is not in their wheelhouse. This project should rather be considered as an opportunity for all those affected to come together to find a solution that can both get our visitors safely to their destinations and provide them with the visual experience they come to enjoy. If this project is approved now there will be no meaningful opportunity to find, fund and implement that solution. Given our current construction options (we can now 3D print a house for goodness sake) I firmly believe such a solution is possible. But, until CalTrans authorities are required to help look for it, only traditional solutions will be proposed. Please send them the message today that this is not a standard project and that it absolutely does require a meaningful and serious search for a solution that addresses both the safety and the visual needs even if that search is difficult.

Beyond the general plea above, I implore you to deny this proposed project for the following specific reasons:

> **The environmental review is inadequate.** The environmental review conducted by Caltrans and self certified by them did not provide the public with complete and accurate information about either the general or the specific proposal prior to certifying the document. Background materials cited in the documents were requested prior to the close of comments on the DEIR but were only provided to me personally after the FEIR was certified (some only when I filed a public information request) and have never been made available to the general public in the context of the environmental review. Other questions raised in DEIR correspondence were similarly unaddressed or were answered inaccurately; for example the contention that there would be no impact on access to the State Park at Garrapata Beach is demonstrably untrue given the impacts of the current construction occurring at this location. There was no public comment period for the FEIR. (see my comment letter on the DEIR, provided separately) There is no serious economic analysis of viewshed degradation in this sensitive location (see below). This is particularly troubling for the larger programmatic EIR. Therefore the County cannot sensibly rely on the CalTrans environmental documents currently before you.

> **Piecing together: The project is an integral part of a larger project and the cumulative effects are not analyzed.** The 7 Big Sur Historic Bridges are a set. Like any set they have more value together than individually. Together they provide a common theme that is an integral part of the Hwy 1 driving experience. This project asks you to allow identified visual degradation at Garrapata and to 'consider' the vague overall project EIR for all the bridges while approving this specific proposal for the Garrapata Bridge.

The rationale for the proposal before you rests heavily on the argument that there is no alternative to changing the existing open balustrade railing design that is an identified defining characteristic of these arch bridges to the standardized minimally transparent option they have presented. If there are indeed no alternatives and CalTrans is not actively pursuing any, the current treatment proposed for Garrapata will also be the only option for the other bridges as well. If there are alternatives that would better preserve the open balustrade design & access to the nearshore views, they should be employed for Garrapata. The project and the environmental documents should explicitly commit to that approach and design for all seven historic bridges including the Bixby Bridge in order to reflect and maintain their ongoing visual, cultural and historic relationship. Nothing presented here does that. Make no mistake: this project will either set the precedent for the other bridges or it will break the set. To say otherwise is implausible.

> **The consideration of options is inadequate.** The Big Sur National Scenic Byway is internationally recognized as a highly important national scenic resource, providing public access to the wild and scenic vistas of Big Sur and providing documented statewide economic benefits as well. Significant public and private effort and sacrifice over nearly a century, including prohibitions on development within the Critical Viewshed and major downzoning to protect highway capacity for visitors, have gone into preserving these unique and valuable visual resources for the benefit of the public. By pursuing only very narrow and standardized project alternatives, CalTrans has not demonstrated the extraordinary efforts already recognized by them as required for this unique situation. Unfortunately there are no records of CalTrans efforts to pursue any exemption processes from state and federal regulations or for that matter any other non-standard approaches that could be applied to such extraordinary situations. (In fact it appears more effort was spent on selecting and implementing the concrete artichoke/strawberry designs on the Salinas Road overpass in North County, which are lovely but perhaps of less international significance?)

> **The Statement of Overriding Considerations cannot be made as proposed.** The staff report before you recommends that you 'adopt a Statement of Overriding considerations finding that there are benefits of the project (public safety) that outweigh significant and unavoidable impacts on the environment (impacts to visual resources).' This finding is not supported by evidence. While the visual resources are of obvious, well documented nearly incalculable aesthetic and economic value, there is no evidence of **any** actual injuries or accidents relating to the current bridge railing design on any of the 7 historic arch bridges over their collective over 90 year lifespans. This project proposes that you should elevate theoretical standard safety concerns as put forward in updated general regulations over the documented need to preserve public access to these treasured scenic resources. To illustrate the imbalance, google Big Sur Bridge photo. You'll see 33,400,000 results (0.55 seconds). There are NO recorded accidents relating to the bridge railings on any of the seven Big Sur historic bridges. 33.4 million is greater than zero. I have provided accident reports supporting this, obtained through public records requests, in prior communications.

> **Some data is misleading as presented.** One example of this problem is that CalTrans rests its argument on the inability to lower the speed limit at Garrapata, which would allow additional railing alternatives to be considered, on a speed study. This study was done midday on Nov 19 2019, a cloudy Tuesday between storms following an announcement of upcoming preemptive road closures for weather. It documents the passage of 120 vehicles over the course of a couple of hours.

On this basis CalTrans concludes there is no opportunity to lower the speed limit because of existing state speed trap laws. They do not however explore applying to our policymakers for an exception given the unusual specific circumstances, which besides visual importance include documented ongoing increasing significant safety issues in the immediate vicinity including an increasing number of serious and fatal accidents occurring due to the growing number of visitors parking along both sides for the roadway to access Garrapata Beach, the State Park immediately north and adjacent to this bridge. Additionally driveways, including mine, enter the highway on both sides in close proximity to the bridge. There is a clear public safety case to reduce the speed limit below 55 in this immediate area already. This needs to be explored.

At best conservative guess there are currently more than 5 million vehicles, with an average of 2 people per vehicle, passing over this bridge each year. For context there were 3.3 million visitors reported to Yosemite in 2020. This study, while certainly allowable according to the standard practice, simply does not accurately reflect public safety conditions at this site. Basing conclusions upon it would be at best short sighted. The rule could be addressed either thru an exception process or if needed thru legislation. It absolutely should not be the sole reason to discount alternatives that could better serve the multiple needs here. I have provided supporting documentation including the actual speed study, obtained through the public information request process but not provided during public review of the environmental documents, and accident data (similarly obtained) in prior communications with the Planning Department and have asked that they be made available for this hearing.

> **Advisory bodies were told they had no alternatives except those presented.** Like the Planning Commission today, County Staff, the Ad Hoc Aesthetic Design Committee, the Historical Resources Review Board and the LUACs were all told by CalTrans at the outset of their considerations that there were no possible alternatives to the designs you see here and that public safety requires the project to proceed. Their recommendations are based on those premises. All the recommendations and resolutions provided by these bodies state that repair of the existing railings or replacement with open balustrade railings closer in appearance to the existing ones would be the preferred alternative if it were possible but that due to the urgent public safety concerns articulated by CalTrans they would reluctantly support the proposal before you since there was no choice. Nobody recommends or supports the current design on its merits or for that matter at all except as a sole option. And, as I suggest above, CalTrans has not shown conclusively that it is, just that it is the only option easily available within standard guidelines. Again, I do not believe this is a standard situation, and easy isn't always best.

> **Immediate public safety is being managed now, the public is not at imminent risk from rail failure.** The project proposal states that immediate action is needed at Garrapata because of the deterioration of the bridge railings. Immediate action, in the form of temporary metal guardrails attached inside the concrete railings, was taken in 2021. The bridge has been undergoing maintenance since that time and currently has one lane open, signal lights at both ends, and speed over the bridge is limited to 20mph. The desire to continue to use the existing construction infrastructure is understandable and efficient but does not remove the need for real considerations of more appropriate solutions since the immediate safety issues are already being addressed. Further, the railings on all the other historic bridges including Rocky Creek bridge and Bixby Bridge are also visibly deteriorating similarly. If as the reports state there is no current plan to repair them then they, too, will be subject to hurried 'emergency' project pressures which result in the inability to create and consider better alternatives for these bridges as well. In my view delaying until a better permanent outcome for this >\$47 million project can be found is well worth temporary inconvenience.

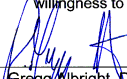
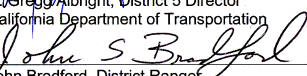


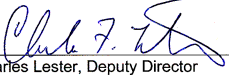

> **The project is inconsistent with CalTrans' Coast Highway Management Plan as proposed.** In an extraordinary effort in 2002-2004, CalTrans facilitated a remarkable multi party collaborative planning guide for this corridor to address exactly the kind of issue now before you where the demands of protecting the visual experience and all the other necessary activities could conflict. While not regulatory, the CHMP outlines shared expectations for maintaining the visual character of the historic bridges and expresses ongoing willingness of all these entities and representatives to work together to find solutions. Here is the signature page showing the participants in this efforts:

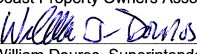
**Steering Committee Ratification
of the
Big Sur Coast Highway Management Plan**

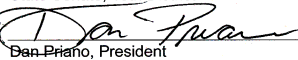
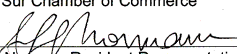
The undersigned members of the Big Sur Coast Highway Management Plan (CHMP) Steering Committee hereby acknowledge:

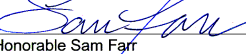
1. Participation in the development and review of the CHMP and associated guidelines for the Highway 1 corridor along the Big Sur Coast between San Carpoforo Creek in San Luis Obispo County and the Carmel River in Monterey County.
2. Broad stakeholder engagement in focused working group sessions that guided development of corridor inventories and technical studies used to support development of the CHMP.
3. Our support for the principles, goals and objectives outlined in the Plan. While such support does not suggest unanimous agreement on all specific management strategies and practices, it does indicate a willingness to work toward collaborative solutions.

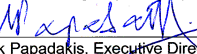

 R. Gregg Albright, District 5 Director
 California Department of Transportation

 John Bradford, District Ranger
 USDA Forest Service
 Monterey District

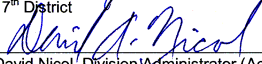

 Charles Lester, Deputy Director
 North Central & Central Coast Districts
 California Coastal Commission

 Honorable Bruce McPherson
 State Senate, 15th District


Mike Caplin, President
 Coast Property Owners Association

 William Douros, Superintendent
 Monterey Bay National Marine Sanctuary

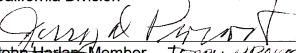

 Dan Priano, President
 Big Sur Chamber of Commerce

 Jeff Norman, Resident Representative
 Big Sur Multi-Agency Advisory Council



 Honorable Sam Farr
 US House of Representatives
 17th District


 Nick Papadakis, Executive Director
 Association of Monterey Bay Area Governments

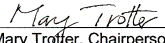

 David Nicol, Division Administrator (Acting)
 Federal Highway Administration
 California Division

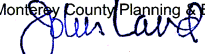

 Dave Potter, 5th District Supervisor
 Monterey County Board of Supervisors

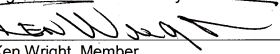

 Jerry Harlan, Member
 South Coast Land Use Advisory Committee


 Phil Jenkins, Monterey District Superintendent
 California Department of Parks & Recreation


 Scott Hennessy, Director
 Monterey County Planning & Building Department


 Mary Trotter, Chairperson
 Big Sur Land Use Advisory Committee


 Honorable John Laird
 State Assembly, 27th District


 Ken Wright, Member
 Monterey County Convention and Visitors Bureau

The extract below: from this Coast Highway Management Plan (2004) addresses bridge railing (emphasis added):

GUIDELINES FOR CORRIDOR AESTHETICS p26-27:

"Historic Bridges"

The concrete arch bridges along Highway 1 are important features of the Carmel-San Simeon Highway Historic District and have been found eligible for listing in the National Register of Historic Places. These bridges, individually and as a cohesive group, are recognized internationally for their aesthetic qualities and engineering design excellence. However, the structures, now over 60 years old, require ongoing maintenance, repairs, and occasional major upgrades.

1. Should any structural modification be identified as a critical need (such as the seismic retrofit program in the 1990s), the visual design of historic bridges should be changed as little as possible. Necessary modifications should be designed visually as if these features had been incorporated in the bridges as originally constructed.¹⁹

Note: The seismic retrofit of Bixby Creek bridge completed in the year 2000 exemplifies the value of this guideline and stands as a model for future modifications to Highway 1's historic bridges. The upgrade, which involved retrofitting the bridge deck as a continuous horizontal diaphragm, seamlessly blends the new and the old to leave the aesthetic integrity of the bridge intact.

2. **Bridge rails on historic bridges should be repaired or reconstructed to replicate the original rails as closely as possible.**





Figure 10: The internationally famous Bixby Creek Bridge in 2002. A close-up of the **open balustrade bridge rail (right photo)** is characteristic of the historic bridges along the Big Sur Coast. "

> **CalTrans is mandated to follow the Corridor Aesthetics Plan.** In 2002 the CA State Legislature passed a bill that requires CalTrans to follow the Plan. This, once again, is intended to drive home the point that on this particular stretch of roadway, which is an international destination, requires extraordinary protections. And, while there is always consideration for public safety, this legislation clearly shows that the recommendations in that document, part of the CHMP, are meant to be taken with extreme and unusual seriousness:

"Assembly Bill No. 2440

CHAPTER 530

An act to add Section 121 to the Streets and Highways Code, relating to state highways.

[Filed with Secretary of State September 15, 2002. Approved by Governor September 13, 2002.]

LEGISLATIVE COUNSEL'S DIGEST

AB 2440, Keeley. All-American Roads.

Existing law provides that the Department of Transportation is responsible for the maintenance and operation of the state highway system.

This bill would require a state highway that has been designated by the federal government as an All-American Road on or before April 30, 2002, to be maintained and operated by the department consistent with the recommendations for context-sensitive design standards relative to aesthetics and safety that are contained in the road's corridor management plan.

DIGEST KEY

BILL TEXT

THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

SECTION 1.

Section 121 is added to the Streets and Highways Code, to read:

121.

Notwithstanding any other provision of law, a state highway that has been designated by the federal government as an All-American Road on or before April 30, 2002, shall be maintained and operated by the department consistent with the recommendations for context-sensitive design standards relative to aesthetics and safety that are contained in the corridor management plan submitted to the Federal Highway Administration."

In closing, as you can see, I care deeply about what happens here. I am sorry I cannot participate in this important hearing. However I have been engaged on the record with the concerns I have tried to outline here and others since 2019, and I hope my efforts help inform the Planning Commission about the stakes involved with this project so that you can help convince CalTrans to either reconsider the scope of options now (the quickest way forward) or that they stand significant risk that they will be required to do so as the project proceeds through the appeal process.

Again, I ask that the Planning Commission DENY the project before you and help in the ongoing efforts to preserve the iconic Highway I experience for everyone, regardless of income or origin, to enjoy as well as survive for at least another 90+ years..

Thank you for your kind attention.

Martha Diehl
mvdiehl@mindspring.com

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