

REDWOOD REGION AUDUBON SOCIETY

P.O. BOX 1054, EUREKA, CALIFORNIA 95502

March 31, 2015



Brad Mettam, Deputy Director
Caltrans District 1
P. O. Box 3700
Eureka, CA 95502-3700

Subject: Last Chance Grade

Dear Mr. Mettam:

Redwood Region Audubon Society (RRAS) has reviewed the last Chance Grade Feasibility Study provided by your agency. RRAS finds alternative routes A1 and B1 to be the most viable of the nine because they meet the goals of the bypass in a reasonable time and have less potentially damaging environmental impact than the other alternatives. We recognize that alternative route F1 would have less long term environmental impact, but due to the long construction period, would unreasonably increase the risk of catastrophic failure of Highway 101 before construction is complete, causing additional environmental and economic impact.

Although alternative routes A1 and B1 are what we believe to be the most environmentally and economically prudent, we have concerns that we think should be addressed in the evaluation process.

Alternative Route A1

1. This route traverses both earth flow and rock slide geology which are some causes of the current road failures. How will these conditions be mitigated?

Alternative Route B1

1. This route traverses rock slide geology which is a cause of the current road failures. How will this condition be mitigated?
2. This route traverses the slope above Wilson Creek for nearly a mile. While not directly in the riparian zone, it is likely to impact the riparian habitat with run-off and noise. How will this impact be mitigated?

Alternative Routes A1 and B1

1. According to the summary report, one acre of old growth redwood would be affected. Specific information needs to be provided on the effects that the project would have, on Marbled Murrelet nesting sites and other old growth dependent species.
2. Caltrans documentation in the initial study report specifies allowable cut and fill heights that could potentially create a footprint over five hundred feet wide to support a fifty-two-foot wide roadway. We would like to see narrower footprint width limits in addition to cut and fill height limits.

3. The initial environmental impact of the construction should be balanced with the impact over the life span of the project, including maintenance and repair. RRAS proposes a 100-year facility lifespan for this purpose.

Although we have chosen to address routes A1 and B1 as the our preferred routes and the ones most likely to undergo further evaluation, we understand that other routes may also be considered for more detailed review. We will comment on those routes if and when they are considered for further review.

Please notify Redwood Region Audubon Society at the address on the letterhead of opportunities for input into the evaluation and selection process.

Sincerely,



**Jim Clark, Conservation Committee Co-Chair
Redwood Region Audubon Society**