

## Points/Comments and Concerns about the Caltrans Alameda Creek Bridge Replacement Project Concept

Submitted to Caltrans by Save Niles Canyon, a Grassroots Community Group

Submitted by PMDubinsky on behalf of SaveNilesCanyon, 3/19/2014

Caltrans asked the public to comment by 23 March on:

- 1) The project's purpose, need and range of reasonable alternatives
- 2) The nature of potential impacts and the best way to describe investigate and evaluate them.

The following points are offered:

### Purpose and Need for the Project

In terms of the purpose and need for the project Caltrans indicates that the current bridge is out of date from a structural standpoint, has several obsolete design features and the bridge approaches contain curves that are too sharp for the posted speed.

When Caltrans initially proposed their three Phase plan for the complete re-do of Niles Canyon Road from Niles to Sunol circa 2010 the bridge replacement portion was slated for Phase 3 and no actual replacement plans were publically circulated. Phase 1 was of course halted by a lawsuit and Phase 2 did not proceed beyond the draft environmental proposal. Now it appears Caltrans has decided that what was originally Phase three of a three part program is now Phase 1 of a two part program to upgrade the road at several key locations. The other key upgrade is to modify the Palomares Road intersection to improve safety. That project seems to be placed behind the bridge replacement from the standpoint of importance and need. In the prior three part initiative it was ahead of the bridge replacement.

Answers to the following questions should therefore be addressed by Caltrans as they prepare a purpose and need statement for bridge replacement.

- Why is the bridge replacement considered higher priority than the Palomares Road intersection improvements? According to the Value Analysis conducted by the Federal Highway Administration based on their Road Safety Assessment of Niles Canyon Road the Palomares intersection was a higher priority from a safety standpoint.
- The need for these multi- million dollar projects was questioned by taxpayers when the Phase 2 project was circulated in 2010. In response Caltrans asked the Federal Highway Administration for a safety review of the road in 2012 and the FHA concluded that a set of short term countermeasures and perhaps a select few medium term countermeasures should be undertaken first. After a period of time, e.g. three to five years, a follow up safety assessment could be made to determine the level of success those less expensive and less environmentally demanding steps would have in enhancing safety before moving to more environmentally damaging and expensive countermeasures. Justifying the need for the Bridge

replacement needs to explain why taxpayer monies need to be spent at all especially before the Palomares Road intersection improvement.

- If the Bridge is seismically unsound and there is some engineering evidence to support that point of view it needs to be made public? For example after the Loma Prieta earthquake weren't all bridges inspected? Where is the report for the Alameda Creek Bridge? If the available information does not include evidence that the bridge is seismically unsound that information should be made public

#### Possible Alternatives to the Current Bridge Rebuilding Alternatives

Notwithstanding the development of bridge replacement design alternative 3b which is appreciated, the four (4) proposals displayed during the Scoping meetings all seem very similar in concept. During 2013 Stakeholder meetings representatives from the various Stakeholder organizations called for a low speed, e.g. 35mph alternative which would force vehicles to operate at a more reasonable and safer, speed. Caltrans representatives continue to explain that current highway engineering standards do not permit such an approach. We believe there are situations where exceptions ought to be made that technically it is possible and such alternatives can be considered as long as safety is not in question. Why not develop such an exception, explain the pros & cons, risks and benefits, and allow the public to react to it?

#### Environmental Impacts

The draft environmental report must explain the mechanism for evaluating the collective environmental and other impacts of several major and medium level projects which are being proposed separately. When circa 2010 Phase 2 of the original 3 Phase Road Safety Improvement program was under review many people pointed out that the perception was that the proposed work on Niles Canyon Road was being piecemealed. Such an approach is not consistent with CEQA principles.

#### Comments Made by the Alameda Creek Alliance

Members of the Save Niles Canyon Group are aware of and agree with the points made by the Alameda Creek Alliance on 26 Feb 2014.