



Keeping Northwest California wild since 1977

May 21, 2014 Transmitted via Email on Same Day: rhooper@co.del-norte.ca.us
Sent by U.S. Mail

Attention: Randy Hooper
Del Norte County Planning and Building
981 H Street, Suite 110
Crescent City, CA 95531

RE: Del Norte County – GP2014-11 Environmental Review of the Grading Permit to
Replace George E. Tryon Bridge in Del Norte County

Dear Mr. Hooper,

On behalf of the Environmental Protection Information Center (EPIC) and our more than 19,000 members and online supporters, we submit to the Del Norte County Planning and Building the following comments for the environmental review of the grading permit to replace George E. Tryon Bridge in Del Norte County, and request that, at a minimum, the agency require an Environmental Impact Report and Environmental Impact Statement.

- 1) As proposed, the project would result in sedimentation entering the South Fork of the Smith River, which would have an adverse impact on anadromous salmonids and other species, which is not adequately evaluated in the mitigated negative declaration. See Attachment A: Declaration of Dr. Christopher A. Frissell. As Frissell lays out in his Declaration regarding Caltrans' highway work along the Smith River:

“...the Proposed Project... would ***systematically alter the biophysical linkages between the river and its watershed.*** That is, the changes in the highway and the watershed of the Smith River and Middle Fork Smith River that would be caused by the Proposed Project would directly and indirectly cause sustained changes in erosion, sedimentation, the entrainment and delivery of toxic materials in roadway runoff, and could cause changes in traffic levels and the risk of toxic spills. Of particular concern are large planned cuts into the soil of slopes above the Smith River and its Middle Fork that would very likely, from the moment the cuts were made until indefinitely into the future, be a source of pervasive, continuous and on-going increased delivery of sediment into the Smith River and its Middle Fork. Notwithstanding the vegetation removal which may have already

Environmental Protection Information Center

145 G Street, Suite A, Arcata, CA 95521

(707) 822-7711

www.wildcalifornia.org

occurred, the likelihood of serious and irreparable harm from the slope cutting is real once that work begins.”

The Tryon Bridge Replacement project includes demolition of the old bridge, clearing of vegetation and excavation of soil above the Smith River which as proposed would “minimize debris entering the South Fork Smith River.” Any amount of debris that would enter the waterway where populations of salmon and steelhead are present would be detrimental to the fish and their habitat, especially when coupled with the cumulative effects of Caltrans’ other currently proposed sediment causing projects along the Smith River.

2) The environmental analysis fails to identify, address and evaluate the cumulative effects of this project in relation to the Caltrans’ 197/199 project and the clear potential for introduction of sediment into the Smith River, with its combined impact on anadromous salmonids and other species. The County cannot simply declare there is no impact without having first provided a thorough discussion and evaluation of related impacts. Reliance on Caltrans’ environmental review documents is insufficient to resolve the issue of cumulative effects, as the Caltrans’ documents declare that there is a likelihood that impacts will occur. The mitigated negative declaration fails to even address related projects. Furthermore, Caltrans’ 197/199 project is in dispute and EPIC and others have successfully filed a preliminary injunction to halt the project, and our independent fisheries expert Christopher Frissell has deemed the environmental analysis as inadequate. As Frissell states in page 7 of Attachment B, “Caltrans’ Proposed Project threatens the Smith River’s water quality and thus the survival of its fish populations.” We provide copies of both Dr. Frissell’s declaration as evidence of the potential for significant environment effect to occur as a result of this project. While this testimony is focused on the Caltrans 197/199 project, it is relevant and persuasive for the County’s bridge replacement project for many of the same reasons as identified by Dr. Frissell. The level of disturbance which is required to replace the Bridge will have similar impacts as identified by Dr. Frissell.

3) As proposed, the project lacks adequate mitigation in view of the above stated analytical gaps.

4) The Mitigated Negative Declaration fails to include full federal environmental review given the several federal agencies partnering in this project. The public is entitled to understand and review a federal NEPA document, and the County has failed to disclose the status of that related process.

5) There is question as to whether this project’s review process is nothing more than a post hoc rationalization, regardless of the circulation of the mitigated negative declaration. Conducting a simple internet search we found that this very same project was “out for bid” in August 2013. A copy of the internet search from last week reveals this information. Yet there is no disclosure about the status of the project in relation to this bid announcement. Please explain why the project shows up on the internet with a bid date of August 15, 2013. Please provide a thorough and

documented historical background documenting the steps taken by the County and its partner agencies, or others, in the pursuit of this project.

6) As written, the environmental analysis fails to consider alternatives that would protect the historic value of the bridge.

7) To avoid further toxic runoff from the project site into the Smith River, mitigation measures shall include a clause that says: "If noxious weed species become established, no herbicides shall be used and manual removal of noxious weeds shall be implemented."

We appreciate the opportunity to comment on this matter, and request a written response to this letter. Please send future public notices and updates relating to this project to me at the address below.

Sincerely,



Amber Shelton,
Conservation and Outreach Advocate
Environmental Protection Information Center
145 G Street, Suite A
Arcata, California 95521
Office: (707) 822-7711
Email: amber@wildcalifornia.org

Enclosures:

Attachment A: Declaration of Dr. Christopher A. Frissell in response to federal defendants' opposition to plaintiffs' motion for preliminary injunction for Case No. 13-cv-4407PJH.

Attachment B: Declaration of Dr. Christopher A. Frissell in support of Plaintiffs' motion for a preliminary injunction; Case No. CV-13-4407PJH.

Attachment C: Internet Search_May 16 2014_Bridge Project