



GUALALA MUNICIPAL ADVISORY COUNCIL

POST OFFICE BOX 67, GUALALA, CALIFORNIA 95445

Mr. Tariq Chechi, Project Manager, Caltrans, District 1
Ms. Nephele Barrett, Executive Director, Mendocino Council of Governments (MCOG)

February 12, 2022

Dear Tariq and Nephele,

Based on extraordinarily strong reaction from our community, the Gualala Municipal Advisory Council (GMAC), at its Feb. 3, 2022, meeting, unanimously recommended that Caltrans and MCOG:

- 1) Withdraw Alternative 4-C for the Gualala Downtown Streetscape plan; and*
- 2) Move forward into the engineering phase with Alternative 4-A, which has found strong and growing support from our community for more than a year.*

The council's action followed a three-week, multimedia community outreach effort by the GMAC Streetscape Committee asking residents to send an email to us expressing their preference between Alt 4-A and Alt 4-C. This effort reached out to Facebook, YouTube, and the Independent Coast Observer newspaper. People responded from Sea Ranch to Pt. Arena; most lived in Gualala.

The 51 respondents chose Alt 4-A over Alt 4-C by a ratio of 22:1. We received one response favoring Alt 2 and a few non-specific comments, including remarks at our Feb. 3 meeting. (GMAC also received one response favoring Alt 3 the day after the comment period closed.) Ten people wrote letters (or long emails), including the owner of the Hotel Breakers, the Superintendent of Schools, members of a large HOA, and two prominent Gualala-based environmental groups. Those five letters were strongly in favor of Alt 4-A over Alt 4-C for a variety of reasons. (See Exhibit 1-Comments and Exhibit 2-Letters.)

GMAC is the only community-level agency chartered by the Mendocino County Board of Supervisors (under Board Policy 51) with "gathering input, making recommendations based on that information and relaying it to the appropriate decision-making body." That mission is the primary purpose of this letter.

The council has additional concerns that surfaced in our public discussions and research, notably that Alt 4-C would replace a quarter-century of reasoned community discussion and compromise with plans that go directly against three key goals for the highway in our 20-year-old Gualala Town Plan (GTP). Those goals are to ease congestion, improve safety, and to "make the highway a scenic element of the Gualala townscape." The GTP is also our Local Coastal Plan (LCP) and is enshrined in county ordinances.

GMAC believes Alt 4-C is so contrary to the LCP that it would require the California Coastal Commission to approve a complex amendment. We ask Caltrans to adhere to the requirements of our existing GTP/LCP, not to try to change them. That is something best left to our community, Mendocino County, and the Coastal Commission.

GMAC supports Alt 4-A because it would be the biggest step toward fulfilling the GTP's goals since the plan was adopted in 2002. It would allow eight existing on-highway parking spaces to remain until Caltrans determines a left-turn lane is needed. At that point, Caltrans would restripe the highway, eliminate those spaces, and the GTP's original vision will be fulfilled. (Note: Alt 2 is very similar, but would add the center turn lane now per GTP requirements. When MCOG directors toured the site in 2019, they reviewed Alt 2. GMAC also supports Alt 2.

An Altered Concept

In April 2021, when GMAC asked MCOG to adopt Alt 4-A, Caltrans announced it was exploring a possible Alt 4-C. The agency said that exploration included interim parking "in front of the Surf Market." A slide showed a three-lane roadway, with arrows and text pointing to a lane in front of the market. The text read: "in front of SURF MARKET" [in caps]. The market owner and his landlord at the Surf Center have long sought to retain taxpayer-supported parking on the highway until the landlord completes a long-stalled redevelopment project at the Surf Center that will add requisite off-highway parking.

Caltrans mistakenly attributed this idea to GMAC, which had withdrawn that request in 2020 when a Caltrans traffic study determined the downtown area was "too congested" to allow interim parking. In May 2021, after Caltrans revived the idea of parking "in front of the Surf Market," GMAC recommended approval of that concept with nine conditions. The first condition was that Caltrans must reverse its earlier finding that the downtown area was too congested for parking. (Caltrans has not done that. Plus, it has said it cannot meet at least six other conditions that GMAC views as prudent and reasonable.)

In December 2021, Caltrans returned with a radically different concept, but did not alert MCOG directors, GMAC, or the public to the significant change. It still referred to this as Alt 4-C. However, this time, the parking was not "in front of the Surf Market" at all. A new slide shifted the proposed "interim" parking to a paved fourth lane in front of the neighboring Hotel Breakers, which has long been strongly opposed to on-highway parking. To make room for that parking, Caltrans would remove a thick hedge that currently shields the hotel's off-highway parking area from view as recommended in the GTP (G3.4-26).

The GMAC committee soon realized the revised draft of Alt 4-C would also violate the GTP, LCP, and county ordinances on several other levels. For example, Alt 4-C would increase downtown congestion instead of alleviating it. It would add parking at the historic center of town instead of removing it. It would remove existing landscaping from downtown instead of adding it. It would pave a fourth lane just for interim parking while the GTP requires three lanes with no parking. It would increase the danger for cars pulling onto the highway instead of reducing it. (These and other concerns are explored in Exhibit 3-Findings.)

Alt 4-C would also effectively cede the fate of the Streetscape project to a private party, who would decide when the so-called "interim" would end. Alt 4-C would leave the "interim" parking in place until the private developer completes a redevelopment project first proposed at least 15 years ago. To date, not a shovel of earth has moved. Because that project involves contentious issues with third parties, the developer would gain undue leverage over the county, Caltrans, and the third parties. GMAC's Streetscape Committee feels it likely that litigation and LCP amendment applications could effectively turn the "interim" parking into permanent parking.

It should be noted that neither the county nor the state is obliged to provide parking for private businesses. In this case, the GTP/LCP requires the elimination of on-highway parking for safety and aesthetic reasons.

When Caltrans and MCOG's Executive Director met with GMAC on Jan. 6 to discuss these issues, Caltrans said it is unable to provide parking "in front of the Surf Market" due to ROW width. The council then sought opinions on 4-A vs 4-C from Gualala-area residents, resulting in the data we're forwarding today.

Abuse of Process

Many community members object to Caltrans' handling of this project since mid-2019. In less than three years, Caltrans has produced six options that were circulated to the public, debated in working groups, studied in committee meetings, discussed in three separate town halls, assessed in surveys, and reported in many news articles. GMAC has received no comments asking for more concepts or another Town Hall. Instead, we received many comments urging you to move ahead with Alt 4-A and eliminate Alt 4-C.

Alt 4-A was proposed by Caltrans, well-circulated within the community, explained in a Caltrans video, debated at public meetings, studied in a Caltrans Town Hall, and analyzed carefully in a Caltrans survey. Caltrans found the community was "very supportive" of Alt 4, and of those who supported Alt 4, a clear majority wanted the transitional parking spaces to remain on the East, as in Alt 4A. GMAC also unanimously recommended approval of Alt 4-A, believing Caltrans and our residents had finally agreed on a plan.

Alas, Caltrans said recently it must conduct another review for Alt 4-C. The only explanation from Caltrans was "this is our process." We respectfully suggest that the agency's process has been abused by a small group of opponents in a campaign to further delay and/or derail the Streetscape project entirely.

While we have not received comments asking Caltrans to hold another review, we have heard numerous requests for Caltrans to "get on with it." It is clearly NOT in the interest of our community for Caltrans to propose plans like Alternative 4-C which, on its face, runs counter to the legal requirements of the GTP/LCP. It appears Caltrans is exceeding the well-intended requirements of CEQA by ordering another review after a year-long delay created by Caltrans while working on Alt 4-C. GMAC repeatedly objected to this delay.

GMAC believes the Coastal Commission would likely approve Alt 4-A without an amendment, given it supports a phased approach to implementing GTP goals. We will convey that position to the Commission. Avoiding an amendment would minimize the risk of what Assistant Planning Director Julia Acker Krog calls "Amendment Creep" which can lead to undue delays, litigation, even investigations.

Gualalans want a highway that is not only safe, but reflects the natural beauty of Mendocino County's South Coast. Because Gualala is the Southern Gateway to Mendocino County, Alt 4-A also will help to generate economic rewards from Gualala to Westport. We will look forward to working with you on completing this long-awaited and much-needed safety project within the existing legal framework.

Respectfully,

Robert Juengling, Chair
Tom Murphy, Vice Chair
on behalf of all members of the
Gualala Municipal Advisory Council

cc: MCOG Directors, Calif. Coastal Commission, Mendocino PBS, Caltrans