



June 17, 2025

Lucas Marsalek
District 5 Environmental Division
California Department of Transportation
50 Higuera Street, San Luis Obispo, CA 93402

RE: Route 246 CAPM and Robinson Bridge
State Route 246 in Santa Barbara County from post miles 9.55 to R20.90
05-SB-246-9.55-R20.90
0519000122
Initial Study with Proposed Mitigated Negative Declaration and Section 4(f) de minimis
Determination – City of Lompoc Comments

Dear Mr. Marsalek:

Thank you for the opportunity to review and comment on the Initial Study with Proposed Mitigated Negative Declaration and Section 4(f) de minimis Determination for Route 246 Capital Preventive Maintenance (CAPM) and the Robinson Bridge replacement. The City of Lompoc (City) would like to express its sincere appreciation to Caltrans District 5 for the progress on this important east/west connection in and out of the City. The City continues to show support for this project, most recently on April 15, 2025, when the City Council authorized the City Manager or his designee to execute the State Route 246 (CAPM) and Robinson Bridge Project Section 4(F) De Minimis Concurrence, as requested by Caltrans. Through the passage of Measure A in November 2008, Santa Barbara County voters supported investing \$8 Million of local transportation sales tax revenue toward widening, elevating, and strengthening the Robinson Bridge and surrounding highway approaches to ensure a continuously useable roadway that is safe for motor vehicles, cyclists, pedestrians, and farm equipment to travel on either side of State Route 246 to or from Lompoc. The City understands that this project requires continued collaboration between Caltrans, the City of Lompoc and the Santa Barbara County Association of Governments (SBCAG) to ensure local and regional needs are met and the best possible outcome for the project. As a responsible Agency, the City has prepared these comments to the Initial Study.

It should be noted that both Design Options 2 and 4 call out two piers (eight 7-foot-wide columns) which does not appear to be consistent with Figures 3-2 and 3-4, which show two piers with four 7-foot-wide columns.

Alternative Selection

The City has reviewed the four alternatives presented in the initial study and with the incorporation of the City's comments herein, it supports Bridge Design Option 4 which includes a 63-foot-wide

cast-in-place bridge with three spans supported by two piers (four 7-foot diameter columns) and includes a 6-foot-wide sidewalk in the eastbound direction and an 11-foot-wide multiuse path in the westbound direction.

The City believes this alternative most supports the needs and desires of the voters who approved the Measure A funding, as well as the purpose and need statements of the Initial Study which included:

Bridge Scour Effects – Replacement of the bridge with a new bridge that addresses existing deficiencies which identified continued scour leading to bridge pier and deck failure and that a 100-year flood would overtop the current bridge. Design Option 4 would reduce the number of piers within the river by three times from 6 to 2, thereby reducing the impact on flow caused by the piers, eliminating piers located near the center of the channel where flow velocities are highest, and potentially reducing the amount of debris that would be trapped, resulting in reduced the scour effects on the piers. Since 1953 the releases from the Bradbury dam have also added to the amount of debris that is lodged against the piers which continues to add to the scour effects. Although not specifically expressed in the initial study, the City requests Caltrans include the necessary design elements in the new bridge to ensure its reliability and minimize scour effects on its piers. Additionally, the City recommends Caltrans coordinate with the County of Santa Barbara Water Agency regarding dam water releases to further reduce the impact of scour on the piers. Further, the City requests Caltrans include in its environmental studies an explanation of why the scour problem occurred for the existing Robinson Bridge.

Flood Elevation – The new bridge will raise the vertical profile by 6 feet to provide 2 feet of free board above the 2% probability (50-year) flood event. It appears the new elevation of the bridge roadway (between 123' to 121.07') will not overtop during a 100-year "base flood" event, however the highwater elevation of 111.41' shown on the proposed plans is inconsistent with the base flood elevation of approximately 119' shown on the current Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Number 06083C0743G revised December 4, 2012 (FIRM 743G). Because State Route 246 east of the City is a critical transportation and evacuation route for those living in this area, it is important that the highway on both sides of the bridge remains open, is adequately drained, and is elevated above the 100-year base flood elevation. The west approach road appears to be sufficiently elevated within the flood hazard area. However, the proposed east approach road at the bridge is about 2 feet lower than the west side and the flood hazard area east extends just east of PM 10.6. FIRM 743G shows existing State Route 246 being under water during a 100-year flood event from approximately the west edge of the existing bridge to approximately 3,500' east of the existing bridge. Additionally, lesser rain events have caused closures of State Route 246 due to localized flooding from poor roadway drainage between the Robinson Bridge and Mission Gate Road. The project should provide sufficient drainage and roadway elevation to facilitate safe travel on State Route 246 east of the City during storms up to and including the 1% probability (100-year frequency) storm event.

Complete Streets – The project area is deficient in Complete Streets elements. There are no pedestrian connections from the City to River Park. Previous studies by both the City

and Caltrans identified the need for pedestrian and bicycle facilities over the Robinson Bridge and throughout the project limits. Design Option 4 will increase the width of the bridge to 63 feet and add not only a 6-foot-wide sidewalk on the eastbound side but will also include an 11-foot-wide multiuse path on the westbound side. Additionally, all design options are proposed to include 12-foot-wide vehicle travel lanes and 8-foot-wide paved shoulders in each direction, consistent with Caltrans standards, to accommodate cyclists, farm equipment, and other needs.

Approach Road Realignment/River Park Connection

At the community meeting held on May 29, 2025, at the City Council Chamber in Lompoc, the community expressed a need to connect Hwy 1 to River Park for both pedestrians and bicyclists. The City would like to see the westbound (north side) of State Route 246 have a multiuse path from State Route 1/Twelfth Street to River Park.

River Park is a 45-acre city park, located along the Santa Ynez River in Santa Barbara County. The park includes five group barbecue areas, additional picnic areas, 35 RV hook-up campsites, volleyball courts, horseshoe areas, and grassy lawns. The park maintains the man-made Kiwanis Lake which attracts a variety of wildlife to the park.

To help facilitate pedestrian and biking facilities the City is working with the owners of a nearly 10-acre parcel located north of State Route 246 and east of Twelfth Street to dedicate easements necessary for Class 1 bike paths from Twelfth Street to approximately 0.2 miles east along the north side of State Route 246 at post mile 9.75 at the Lompoc utility building, as well as an easement running north-south along the eastern edge of the parcel. Coordination with the Caltrans design team will be needed to facilitate path connections and address grade changes as a result of elevating the bridge 6 feet.

On the west side of the proposed bridge there is less than a 0.1-mile gap between the proposed Class 1 bike path ending at post mile 9.75 and the start of the proposed 11-foot-wide multiuse path on the bridge and on the east side, there is approximately 0.12 miles from the bridge to the entrance to River Park. The plan calls for an 8-foot-wide shoulder for these sections. The City requests that an 11-foot shoulder be constructed on the north side of State Route 246 from post mile 9.75 to the west side of the proposed bridge, and from the east side of the proposed bridge to River Park for continuity between the Class 1 bike path and the 11-foot-wide multi-use path on the bridge. Adding an additional 3 feet to the shoulder will improve safety and continuity for the multi-use path to the park. Because there are no controlled crossings of State Route 246 between Twelfth Street and River Park, widening the shoulder in those two areas is a prudent safety improvement to reduce the need for crossing State Route 246 at River Park/Sweeney Road.

Pedestrian Barrier

Although the City would support a more aesthetic treatment for the pedestrian railing on the outside of the bridge, the City does not have the resources to maintain facilities outside its jurisdiction as it understands Caltrans would require for such treatment. There are other types of fencing options besides the Caltrans Standard Type 7 chain link fence that may cost a little more

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up front but would be more aesthetically pleasing and require less maintenance than the chain link fence.

Pavement Rehabilitation Elements

The community expressed safety concerns regarding State Route 246 and this project during the public meeting on May 29, 2025. Consistent with those community concerns, the City requests that Caltrans consider widening paved shoulders, elevating the roadway, and improving drainage where possible beyond the currently proposed limits of such work near the bridge, to improve the safety of this section of highway. This section of State Route 246 is a critical east/west connection to US Route 101 and the Santa Ynez Valley, and the diverse types of vehicles and users within the narrow existing roadway make it challenging to safely navigate. Adequate paved shoulders would provide space for bicyclists, farm equipment, and other slower-moving users separate from the many other vehicles using the highway.

Traffic Management Plan

The City requests that it is given an opportunity to review the project specific Traffic Management Plan when it is available. This plan should include elements such as:

- Minimizing traffic delays.
- Adequate access to the City's River Park and utility building, as well as to Sweeney Road to be continuously maintained.
- Avoiding night work to further lessen impacts to park visitors.
- A Public Awareness Campaign to notify the public of the upcoming construction schedule and allow for prior planning.
- Adequate advance warning signs.
- Bicycle and Pedestrian Accommodations.

Congratulations on the progress on this critical project and thank you for this opportunity to comment on the Initial Study with Proposed Mitigated Negative Declaration and Section 4(f) de minimis Determination for Route 246 CAPM and the Robinson Bridge replacement. We look forward continuing working with you and SBCAG to improve the safety, reliability, pedestrian and bicycle access, and resilience to flooding and scour for this section of State Route 246. The City reserves the right to submit additional comments based on the responses to this letter. If you should have any questions regarding this letter, please contact Craig Dierling, Interim Public Works Director at (805) 875-8269 or Robin Dickerson, Acting Assistant Public Works Director/City Engineer (805) 875-8243.

Sincerely,

James Mosby
Mayor

cc: Fred Luna SBCAG